

In the Matter Of:

IN RE JANET MONDRAGON

JANET MONDRAGON

March 22, 2016

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MONDRAGON JANET
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CITY OF CHICAGO

INSPECTOR GENERAL'S OFFICE

OFFICE OF INSPECTOR GENERAL

INTERVIEW OF:

JANET MONDRAGON

TRANSCRIPT OF PROCEEDINGS had in the
above-entitled cause on the 22nd day of March

A.D. 2016

1 APPEARANCES:

2 INSPECTOR GENERAL'S OFFICE

3 740 North Sedgwick, Suite 200,

4 Chicago, Illinois 60654,

5 773-478-5227, by:

6 MS. SARAH S. ANSARI

7 Assistant Inspector General

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9 MR. KRISTOPHER BROWN

10 Investigator III

11 kbrown@chicagoinspectorgeneral.org,

12 Appeared on behalf of the Inspector

13 General's Office;

14

15 J. RUSSELL LAW, LLC

16 206 South Jefferson

17 Chicago, Illinois 60661

18 312-207-1220, by:

19 MS. JENNIFER W. RUSSELL

20 jennifer.russell@jrusSELLlaw.com,

21 Appeared on behalf of the Interviewee.

22 ALSO PRESENT:

23 COMMANDER ROBERT KLIMAS, via telephone.

24

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1 MS. ANSARI: As a preliminary matter, I am
2 providing the following information: An independent
3 certified court reporter is present today to provide
4 a verbatim transcript of this interview. To aid in
5 the accuracy of the transcript, it is the custom and
6 practice of court reporters to audio-record the
7 interview.

8 The recording is the confidential work
9 product property of the court reporter and will not
10 be provided to any party, including the OIG, the
11 Office of Inspector General. If you request, the
12 audio recording will be discontinued.

13 So, Officer Mondragon, are you okay with
14 the audio recording?

15 MS. RUSSELL: And we are going to ask for a
16 certification from the court reporter that the audio
17 will not be provided to the Office of Inspector
18 General.

19 THE REPORTER: Yeah.

20 MS. RUSSELL: Thank you.

21 MS. ANSARI: Officer Mondragon, are you okay
22 with the audio recording?

23 THE INTERVIEWEE: Yes.

24 MS. ANSARI: Let the record reflect that

1 today's date is March 22, 2016. The time 10:23 a.m.
2 We are located at Amicus Court Reporters, 300 West
3 Adams, Suite 800.

4 My name is Sarah Ansari, the court
5 reporter is Andrew Pitts, and I would ask that the
6 other individuals present identify themselves and
7 spell their name for the record.

8 MR. BROWN: Kristopher Brown, B-R-O-W-N, City
9 of Chicago Office of Inspector General.

10 MS. RUSSELL: Jennifer Russell, R-U-S-S-E-L-L,
11 attorney for the officer.

12 THE INTERVIEWEE: Officer Janet Mondragon,
13 M-O-N-D-R-A-G-O-N.

14 MS. ANSARI: There are no other individuals
15 present.

16 We are here today pursuant to an
17 investigation being conducted under Chapter 2-56 of
18 the Municipal Code of the City of Chicago. We are
19 here for an interview of Officer Janet Mondragon.

20 Officer Mondragon, would you please raise
21 your right hand, and the court reporter will swear
22 you in.

23 THE INTERVIEWEE: I didn't know that I was
24 supposed to swear.

1 MS. RUSSELL: Yes, you are.

2 (Whereupon, the Interviewee was
3 administered an oath.)

4 MS. RUSSELL: Prior to continuing, we would
5 like to state for the record and obtain Inspector
6 General's position on whether they believe criminal
7 charges are probable in this case. We assert that
8 Officer Mondragon should be receiving her Miranda
9 warnings and her right to remain silent. What is
10 the Office of Inspector General's position on that?

11 MS. ANSARI: OIG is conducting an
12 administrative investigation, not a criminal
13 investigation. OIG is not conducting a joint
14 investigation and not working with any other law
15 enforcement agency with respect to this
16 investigation. As a result, the Office of Inspector
17 General does not have information on whether or not
18 criminal charges are probable.

19 The outcome of this administrative
20 investigation relates to the subject's employment,
21 and therefore under the CBA and General Order, the
22 administrative rights of the Office of Inspector
23 General will provide Officer Mondragon are
24 appropriate.

1 In addition, the arguments being put
2 forward would eviscerate Garrity, and we are going
3 to proceed as we believe we are entitled to legally.

4 JANET MONDRAGON,
5 called as an Interviewee herein, having been first
6 administered an oath, was examined and testified as
7 follows:

8 EXAMINATION

9 BY MS. ANSARI:

10 Q. Officer Mondragon, I am now going to hand
11 you a form that is marked Advisement Of Rights.
12 This has already been filled in with your name, my
13 name, and Investigator Brown's name. I am going to
14 ask you to read along with me as I go through it,
15 and then I will ask you after each paragraph to
16 acknowledge you have read that paragraph.

17 MS. RUSSELL: Can I have a copy, please?

18 MS. ANSARI: Oh, yes. I apologize.

19 MS. RUSSELL: Thank you.

20 (Whereupon, a document was tendered
21 to counsel.)

22 BY MS. ANSARI:

23 Q. "I understand that this interview is part
24 of an official investigation and that I have a duty

1 to cooperate with the Office of Inspector General,
2 which includes answering all questions completely
3 and truthfully."

4 Have you read that paragraph?

5 A. Yes.

6 Q. "I understand that I have no right to
7 remain silent. I understand that I have an
8 obligation to answer questions put to me
9 truthfully. I understand that if I refuse to
10 answer questions put to me, I will be ordered by a
11 superior officer to answer the questions.

12 "I further understand that I have been
13 advised that if I persist in my refusal to answer
14 after an order to do so, such further refusal
15 constitutes a violation of the rules and the
16 regulations of the Chicago Police Department and
17 may serve as the basis for my discharge."

18 Have you read that paragraph?

19 A. Yes.

20 Q. "I understand and have been advised that
21 my the statements and responses may constitute an
22 official police report. I understand that Rule 14
23 of the Chicago Police Department's rules and
24 regulations prohibits making a false report,

1 written or oral, and I further understand that
2 making such a false report, whether written or
3 oral, may result in my separation from the Chicago
4 Police Department."

5 A. Yes. I read that.

6 Q. "I understand that any statement made by
7 me during this interview may be used as evidence of
8 misconduct or as the basis for disciplinary action
9 up to and including removal or discharge."

10 Have you read that paragraph?

11 A. Yes.

12 Q. "I understand that any statement made by
13 me during this interview and the fruits thereof
14 cannot be used against me in a criminal
15 proceeding."

16 Have you read that paragraph or sentence?

17 A. Yes.

18 Q. "I understand that I have the right to
19 have a union representative or legal counsel of my
20 choosing present at the interview to consult with
21 and that I will be given a reasonable time to
22 obtain a union representative or legal counsel as
23 long as the interview is not unduly delayed."

24 Do you understand that paragraph?

1 A. Yes.

2 Q. "I understand that a refusal to answer
3 any question or any false, inaccurate, or
4 deliberately incomplete statement by me would
5 constitute a violation of Chicago Municipal
6 Ordinance 2-56 and may serve as the basis for my
7 discharge."

8 Have you read that paragraph?

9 A. Yes.

10 Q. "I acknowledge that this statement of my
11 administrative rights has been read aloud to me,
12 and I have been allowed to review this document."

13 Have you read that paragraph?

14 A. Yes.

15 MS. ANSARI: I ask that you sign the Advisement
16 of Rights.

17 MS. RUSSELL: Read that out loud (indicating).

18 THE INTERVIEWEE: Upon advice of my counsel, I
19 am refusing to answer any further request questions
20 without the direct order of a superior officer.

21 BY MS. ANSARI:

22 Q. Officer Mondragon, is it fair to say that
23 you will not answer questions from the Office of
24 Inspector General regarding the Laquan McDonald

1 shooting?

2 A. Based on the advice of my counsel, yes.

3 MS. ANSARI: At this time, I am going to place
4 a phone call to Commander Robert Klimas. Counsel,
5 is it fair to say you have agreed that we could have
6 Commander Klimas order Officer Mondragon to answer
7 questions via telephone?

8 MS. RUSSELL: Yes, of course I agreed. Could
9 we go off the record?

10 MR. BROWN: The time is 10:29, and we'll go off
11 the record.

12 (Whereupon, a break was taken at
13 10:29 a.m.)

14 MR. BROWN: It's still 10:29. Back on the
15 record.

16 COMMANDER KLIMAS: (Via telephone) Klimas.

17 MS. ANSARI: Commander Klimas, this is Sarah
18 Ansari from the Office of Inspector General.

19 COMMANDER KLIMAS: Good morning.

20 MS. ANSARI: Good morning. We are currently in
21 a court-reported interview of Officer Janet
22 Mondragon. Her counsel, Jennifer Russell, is here,
23 Investigator Kris Brown is here, and the OIG
24 office -- Assistant Inspector General Sarah Ansari

1 are all here.

2 The Office of Inspector General, having
3 provided appropriate notice to Officer Mondragon of
4 this interview, is attempting to ask Officer
5 Mondragon questions regarding the Laquan McDonald
6 shooting. She has refused to answer questions
7 regarding the shooting absent a command from a
8 superior officer.

9 So I am asking you, Commander Klimas, to
10 order Officer Mondragon to answer the Office of
11 Inspector General's questions.

12 COMMANDER KLIMAS: Okay. This is Commander
13 Robert Klimas, K-L-I-M-A-S, with the Chicago Police
14 Department Bureau of Internal Affairs.

15 Officer Janet Mondragon, I am giving you
16 a direct order to answer all the questions posed to
17 you today by the investigators from the Office of
18 Inspector General, City of Chicago. Do you
19 understand?

20 THE INTERVIEWEE: Good morning. 10-4.

21 COMMANDER KLIMAS: Okay.

22 THE INTERVIEWEE: Yes.

23 COMMANDER KLIMAS: Thank you.

24 MS. ANSARI: Thank you. Have a good day.

1 COMMANDER KLIMAS: Bye-bye.

2 MS. RUSSELL: Upon receiving the direct order,
3 the officer is signing the Exhibit 1 Advisement of
4 Rights.

5 MS. ANSARI: Okay.

6 MS. RUSSELL: I am tendering it back to the
7 Inspector General's Office.

8 MS. ANSARI: And Sarah Ansari and Kristopher
9 Brown are witnessing the Advisement of Rights, and
10 we would mark that into evidence as Exhibit 1.

11 (Whereupon, Exhibit 1 was marked
12 for identification.)

13 MR. BROWN: And I am going to note the time is
14 10:32.

15 BY MS. ANSARI:

16 Q. Okay. Officer Mondragon, before we get
17 into questioning, I am going to mark several
18 exhibits and ask you if you have seen them and if
19 you received them, and we will go through those
20 just in the beginning and get that taken care of
21 for the record.

22 MS. RUSSELL: And also for the record, the
23 officer has the right to receive her statement
24 within 72 hours of resolution of the statement, and

1 that can be delivered to my office.

2 MS. ANSARI: Okay. Marking as Exhibit 2 a
3 document entitled Notification of Interview for CPD
4 Member Mondragon, dated February 24, 2016.

5 (Whereupon, Exhibit 2 was marked
6 for identification.)

7 BY MS. ANSARI:

8 Q. Officer Mondragon, have you seen this
9 document?

10 A. Yes.

11 Q. Did IAD provide you with this document on
12 or about February 24, 2016?

13 A. Yes.

14 Q. Is that your signature --

15 A. Yes.

16 Q. -- on this document?

17 (Whereupon, Exhibit 3 was marked
18 for identification.)

19 BY MS. ANSARI:

20 Q. Marking as Exhibit 3 a document entitled
21 Notification of Allegations, dated February 24,
22 2016. Officer Mondragon, have you seen this
23 document?

24 A. Yes.

1 Q. Did IAD provide you with this document on
2 or about February 24, 2016?

3 A. Yes.

4 Q. Is that your signature on page 3 of the
5 document?

6 A. Yes.

7 (Whereupon, Exhibit 4 was marked
8 for identification.)

9 BY MS. ANSARI:

10 Q. Marking as Exhibit 4 a document entitled
11 Receipt Form, dated February 24, 2016.

12 Officer Mondragon, have you seen this
13 document?

14 A. Yes.

15 Q. And did IAD provide you with this
16 document on or about February 24, 2016?

17 A. Yes.

18 Q. Is that your signature on page 2?

19 A. Yes.

20 (Whereupon, Exhibit 5 was marked
21 for identification.)

22 BY MS. ANSARI:

23 Q. Marking as Exhibit 5 a transcript of the
24 October 21, 2014 IPRA interview of Officer

1 Mondragon.

2 Officer Mondragon, have you seen this
3 document?

4 A. Yes.

5 Q. Did IAD provide with you this document on
6 or about February 24, 2016?

7 A. Yes.

8 (Whereupon, Exhibit 6 was marked
9 for identification.)

10 BY MS. ANSARI:

11 Q. Marking as Exhibit 6 an excerpt of a CPD
12 Case Supplementary Report, dated March 26, 2015
13 with RD number HX475653 containing Officer
14 Mondragon's statement to Detective March.

15 Officer Mondragon, have you seen this
16 document?

17 A. Yes.

18 Q. Did IAD provide you with this document on
19 or about February 24, 2016?

20 A. Yes.

21 (Whereupon, Exhibit 7 was marked
22 for identification.)

23 BY MS. ANSARI:

24 Q. Marking as Exhibit 7 a General Progress

1 Report dated October 20, 2014 with RD number
2 HX475653 containing Detective March's notes of his
3 interview of Officer Mondragon.

4 Officer Mondragon, have you seen this
5 document?

6 A. Yes.

7 Q. And did IAD provide with you this
8 document on or about February 24, 2016?

9 A. Yes.

10 Q. In order to prepare for today's
11 interview, did you review the materials we
12 provided?

13 A. Yes.

14 Q. Those --

15 MS. RUSSELL: Note for the record that while
16 the document indicates that audio files were
17 provided to the officer, no files were contained on
18 the disk.

19 BY MS. ANSARI:

20 Q. Those materials included video files from
21 the in-car systems of vehicles 813R and 845R,
22 correct?

23 A. Yes.

24 Q. Did you view the video files?

1 A. No.

2 Q. The materials we provided included a
3 video from a Dunkin' Donuts security camera as
4 well, correct?

5 A. Yes.

6 Q. Did you view that Dunkin' Donuts security
7 video?

8 A. No.

9 Q. Since receiving our notice of interview,
10 did you review any materials other than the
11 materials we have provided you today?

12 A. No.

13 Q. Aside from your attorney, who did you
14 speak to in preparation for this interview?

15 A. Nobody.

16 Q. So just your attorney?

17 A. Just my attorney, yes.

18 Q. Officer Mondragon, do you have any
19 prepared remarks you would like to make before we
20 start the substance of the interview?

21 A. I would like to preface this statement
22 with the following: I believe I am entitled to be
23 informed of my constitutional rights to remain
24 silent. I have received no assurance from the

1 Office of the Inspector General that criminal
2 charges are not probable.

3 Proceeding with this statement is in
4 violation of the applicable collective bargaining
5 agreement, but I have been advised that I will lose
6 my job if I refuse to provide this statement.

7 This statement is not being made
8 voluntarily but under duress, and it is only being
9 made at this time because I know that I will lose
10 my job if I refuse the direct order being given to
11 me by my commander, Klimas. I am invoking each and
12 every right granted to me under Garrity v. New
13 Jersey.

14 Also, on the advice of my counsel, I am
15 making the following additional objections: I am
16 objecting to the fact that the City of Chicago
17 Inspector General's Office is making allegations
18 against me and conducting an investigation into its
19 own allegations.

20 I am objecting that this interview is
21 taking place before an arbitrator has decided the
22 issues that were raised in regards to this
23 investigation. The Fraternal Order of Police has
24 filed a grievance and injunction regarding this

1 investigation, and the Inspector General refused to
2 postpone this interrogation.

3 I am also objecting that I have
4 requested my prior sworn testimony, namely the
5 testimony I provided to the Grand Jury. The
6 Inspector General refused to provide me with a copy
7 of my Grand Jury testimony and/or any other
8 statements that I have made to the federal
9 investigators in violation of my rights under the
10 contract. The Inspector General indicated that it
11 does not have possession of my Grand Jury
12 testimony.

13 To the extent I am questioned about my
14 Grand Jury testimony, I assert that the testimony
15 is truthful and was based upon my recollection at
16 the time. I stand by all of my answers.

17 MS. ANSARI: The Office of Inspector General
18 would like to reiterate that it is conducting an
19 administrative investigation, not a criminal
20 investigation. The Office of Inspector General is
21 not conducting a joint investigation and not working
22 with any other law enforcement agency with respect
23 to this investigation.

24 Therefore, the administrative rights

1 provided, Officer Mondragon, are appropriate. In
2 addition, the arguments being put forward would
3 eviscerate Garrity, and we are going to proceed as
4 we believe we are legally entitled to.

5 Furthermore, the Office of Inspector
6 General does not have the subject's Grand Jury
7 statement in its possession, and under the
8 collective bargaining agreement does not have an
9 obligation to provide the subject with a statement
10 that is not in its possession.

11 Are you guys ready to proceed?

12 THE INTERVIEWEE: Yes.

13 EXAMINATION (resumed)

14 BY MS. ANSARI:

15 Q. Okay. So we will start with some
16 background questions.

17 Officer Mondragon, what is your Star
18 number?

19 A. 4364.

20 Q. And your current unit of assignment?

21 A. 8th District.

22 Q. Was that your unit of assignment on
23 October 20, 2014?

24 A. Yes.

1 Q. What watch were you on as of October 20,
2 2014?

3 A. Midnights.

4 Q. Midnights?

5 What was your chain of command as of that
6 day? So did you report to -- what sergeant -- who
7 was the sergeant you reported to who was the
8 lieutenant, perhaps a commander? Who were the
9 people you reported to?

10 A. I don't remember. That night?

11 Q. That night or in --

12 A. I don't recall, yeah.

13 Q. Okay. What is your personal cell phone
14 number?

15 A. [REDACTED].

16 Q. Was that your cell phone number as of
17 October 20, 2014?

18 A. Yes.

19 Q. I am going to ask you a couple questions,
20 several questions, about your Grand Jury statement.

21 You were summoned to give testimony
22 before a Federal Grand Jury regarding the Laquan
23 McDonald shooting, correct?

24 A. Yes.

1 Q. Did you give testimony only once before
2 the Federal Grand Jury?

3 A. Uh --

4 Q. Did you testify more than once regarding
5 the Laquan McDonald shooting?

6 A. No.

7 Q. Do you remember when -- when was your
8 testimony in front of the Federal Grand Jury?

9 A. I don't remember.

10 Q. Was it in 2015?

11 A. I don't remember if it was 2015.

12 Q. Would it have been before -- was it
13 before Officer Jason Van Dyke was charged with
14 murder?

15 A. I know it was last year, which was 2015,
16 but I don't remember when.

17 Q. Okay. Do you remember season?

18 A. No.

19 Q. Was it summer, fall, before November?

20 A. No.

21 Q. In the Federal Grand Jury, did you assert
22 your rights under the Fifth Amendment and refuse to
23 testify?

24 A. I don't remember that.

1 Q. Did you answer questions in the Federal
2 Grand Jury?

3 A. Yes.

4 Q. And you did not refuse to answer
5 questions?

6 A. No.

7 Q. So you did not assert a right to remain
8 silent?

9 A. Like I said, I don't remember if I did.
10 Oh, okay. No.

11 Q. Okay. Did you request any immunity to
12 testify?

13 A. No.

14 Q. Were you given any immunity to testify?

15 A. Not that I remember, no.

16 Q. Approximately how long were you
17 testifying in the Federal Grand Jury, how many
18 hours or minutes?

19 A. I have no idea.

20 Q. Was it longer than one day?

21 A. No.

22 Q. Okay. So it was only one day, correct?

23 A. Well, it was in a day, yeah.

24 Q. Was it several hours?

1 A. Yeah, I would say several hours.

2 Q. Several hours? Okay. More than five?
3 Less than five?

4 A. That I wouldn't be able to tell you.

5 Q. Okay. Did you take a break for lunch?

6 A. No.

7 Q. Did you provide a written statement to
8 the Grand Jury?

9 A. I don't remember.

10 Q. Were you shown any documents in the Grand
11 Jury?

12 A. I don't remember that.

13 Q. So the person questioning you, the
14 assistant U.S. attorney, didn't give you any
15 documents to look at before when you testified?

16 A. I can't remember if she did or if he
17 did. I don't remember who.

18 Q. Was it a man or a woman? You don't
19 remember?

20 A. I can't remember.

21 Q. Did you watch any video in your -- in the
22 Grand Jury?

23 A. Uh --

24 Q. Were you shown any video?

1 A. Here's the thing. When I went for the
2 Grand Jury, they said I shouldn't talk to anybody
3 about my Grand Jury testimony. So I don't even
4 know if I'm supposed to answer any questions about
5 it.

6 Q. Well, on the Grand Jury, usually there's
7 a list of people who are -- you are allowed
8 to -- under the law, you can discuss your Grand
9 Jury statement with us. There's a certain list
10 that's put out there of people that cannot discuss
11 it, and you are not on that list. So it is
12 permissible to testify about what you stated in the
13 Grand Jury or the questions we're asking you, is
14 our position.

15 MS. RUSSELL: Can you produce some list or -- I
16 don't know what you're talking about.

17 THE INTERVIEWEE: What do you mean? What list?

18 MS. ANSARI: Well, we assume she is not on a
19 6(e) list because witnesses usually aren't put on
20 those. So we don't have any list in our possession.
21 It is just the witnesses on a Grand Jury are not
22 usually put -- under the law, witnesses are not
23 subject to confidentiality about what they stated in
24 the Grand Jury. That's our position.

1 THE INTERVIEWEE: But like I said, they told
2 me, don't, you know, for -- your best advice is
3 don't talk to anybody about your Grand Jury
4 testimony.

5 MS. RUSSELL: Then don't. Then don't.

6 MS. ANSARI: So we can ask maybe some
7 background questions, but not the substance. That's
8 fine.

9 THE INTERVIEWEE: Okay.

10 BY MS. ANSARI:

11 Q. So I'll ask you questions kind of about
12 what procedurally happened. If you aren't going to
13 talk about the substance, then we will move forward
14 from that.

15 MS. RUSSELL: I think she feels like she can't.
16 I don't think she is refusing.

17 MS. ANSARI: I understand that.

18 MS. RUSSELL: Okay.

19 BY MS. ANSARI:

20 Q. So I am going to just ask procedural
21 questions, and if you don't feel comfortable
22 answering, just say that for the record.

23 A. Okay.

24 Q. And I am still going to ask the subject

1 questions, but if you don't feel comfortable
2 answering, just let me know.

3 As a general matter, in the Grand Jury,
4 were you asked questions about the Laquan McDonald
5 shooting?

6 A. Yes.

7 Q. Did you describe the shooting incident?

8 A. I don't remember.

9 Q. Prior to your Grand Jury testimony, did
10 you speak with the FBI?

11 A. Prior to my Grand Jury testimony?

12 Q. Correct.

13 A. Yes.

14 Q. Was it one or two agents, or who?

15 A. I can't remember. I know there was a
16 few there.

17 Q. There were a few agents?

18 A. Uh-huh.

19 Q. Were they men or women?

20 MS. RUSSELL: You have to answer out loud.

21 THE INTERVIEWEE: Okay. All right.

22 BY MS. ANSARI:

23 Q. Do you remember when it was?

24 A. No. That, no, I don't know.

1 Q. Was it several weeks before your Grand
2 Jury statement or months?

3 A. I have -- I have no idea.

4 Q. Your conversation with the feds -- with
5 the FBI, did they ask you about the substance,
6 about what you saw the night of the Laquan McDonald
7 shooting?

8 A. They asked about the Laquan McDonald
9 shooting, yes.

10 Q. Okay. And what did you tell them?

11 A. I don't remember.

12 Q. Did you have any conversations by phone,
13 e-mail, or text with Officer Sebastian regarding
14 the subject of the Laquan McDonald shooting before
15 your Grand Jury testimony?

16 A. No.

17 Q. Did you have any conversations with Jason
18 Van Dyke by phone, e-mail, text, any communications
19 at all before your Grand Jury testimony about the
20 Laquan McDonald shooting?

21 A. I don't believe so. I can't remember,
22 but --

23 Q. Did you make any attempt to ensure that
24 the statement you were going to provide to the

1 Grand Jury was consistent with the statements
2 provided by the other officers who were present at
3 the McDonald shooting?

4 A. No.

5 Q. Do you remember if the FBI -- you said
6 that the FBI also interviewed you. Do you remember
7 if they showed you any documents when they
8 interviewed you?

9 A. No, I don't remember.

10 Q. Did they show you any video when they
11 interviewed you?

12 A. Video, yes.

13 Q. They did show you video.

14 What did they say about the video when
15 they showed it to you?

16 A. I mean, it was the Laquan McDonald
17 shooting, but I don't remember exactly what they
18 said.

19 Q. Can you give a general --

20 A. No, I don't remember.

21 MS. ANSARI: Do you have any questions about
22 the Grand Jury?

23 MR. BROWN: Just a couple brief ones.
24

EXAMINATION

BY MR. BROWN:

Q. Were you represented by an attorney before you spoke or gave testimony at the Grand Jury?

A. Yes.

Q. Do you recall the name of the attorney?

A. I don't -- I can't remember who it was.

Q. Was it the attorney that is representing you today?

A. No.

Q. Do you recall if the attorney was a man or a woman?

A. It was a male.

Q. And prior to giving your testimony before the Grand Jury, do you recall signing any documents?

A. No, I don't remember.

Q. Did your attorney speak with you about any agreements?

A. Not that I remember, no.

Q. You noted earlier that you were advised not to speak about your testimony before the Grand Jury. I wanted to ask, who gave you that advice?

1 A. Whoever -- when I went for the Grand
2 Jury, whoever was the -- I don't know if it was the
3 FBI agent or whoever conducted the interviews.
4 I don't know who.

5 Q. You mean the interviews with the FBI?

6 A. The -- no, at the Grand Jury. When I
7 was at the Grand Jury, when I walked out, they
8 said, you know, it's best if you don't discuss your
9 testimony with anyone.

10 Q. Was that the same person that was asking
11 you questions throughout the Grand Jury testimony?

12 A. Yes.

13 Q. And I think you said you don't recall
14 that person's identity?

15 A. I don't -- no. I don't remember.

16 Q. Do you recall if it was a man or a woman?

17 A. No. There was a few there, so --

18 Q. Oh. You were questioned by more than one
19 person at the Grand Jury?

20 A. I don't know if questioned, but there
21 was more people in the room.

22 Q. Okay. I'm not talking about the people
23 who might have been kind of in the audience --

24 A. No. No. I'm talking about the people

1 that were there. There was more.

2 Q. The people that were questioning?

3 A. Uh-huh.

4 Q. There was more than one person?

5 A. Yes.

6 Q. So two people?

7 A. It could have been two, but like I said,
8 it might have been three. I can't remember.

9 Q. Did you take any notes?

10 A. No.

11 Q. About your experience in there?

12 A. No.

13 Q. Did you speak to either of those persons,
14 if it be one or two or three persons that actually
15 questioned you in the Grand Jury, did you speak to
16 them afterwards?

17 A. No.

18 Q. How did you learn that the FBI wanted to
19 speak with you?

20 A. How did I learn?

21 Q. Uh-huh.

22 A. About -- well, I got served. They went
23 to my house.

24 Q. The FBI did?

1 A. Yeah.

2 Q. Okay. Tell us -- well, what happened
3 there?

4 A. Well, they were banging on my door, and
5 my son said, "Mom, there's someone at the door." I
6 go to the door, and there's the two FBI agents, and
7 they said, "Here. We're serving you with this.
8 It's regarding the shooting." That's it.

9 Q. Was this a subpoena?

10 A. I believe so. Yes.

11 Q. Was the subpoena related to the Grand
12 Jury testimony you had to give?

13 A. Yes.

14 Q. After the agents served you the subpoena,
15 did they interview you at your home?

16 A. No.

17 Q. But they did interview you at some point
18 down the road?

19 A. Yes.

20 Q. Do you recall where the interview took
21 place?

22 A. Are you talking about the Grand Jury
23 interview?

24 Q. No, I'm sorry. I'm talking about when

1 the FBI agents spoke with you and asked you
2 questions about the McDonald incident.

3 A. Oh, okay. Okay.

4 Q. Do you recall where that interview took
5 place?

6 A. That was at 26th and Cal.

7 Q. And did that interview with the FBI occur
8 before your Grand Jury testimony?

9 A. Yes.

10 Q. The interview at 26th and Cal, was it
11 just the two FBI agents that served you the
12 subpoena? Were they the same ones that did the
13 questioning?

14 A. I don't remember that, but I don't think
15 so.

16 Q. Okay. You don't think so.

17 Were you represented by an attorney for
18 this interview with the FBI?

19 A. Yes.

20 Q. Okay. Did you sign any documents prior
21 to speaking with the FBI?

22 A. I don't remember. I don't think so, but
23 I don't remember.

24 Q. Do you recall discussing any type of

1 agreements or offers or anything with your
2 attorney?

3 A. I don't remember that, no.

4 Q. Was the attorney who represented you for
5 your interview with the FBI the same one that
6 represented you at the Grand Jury?

7 A. Yes.

8 Q. Did you -- I'm sorry. Before we get to
9 that, in addition to the FBI agents that
10 interviewed you, was there anyone else in the room?

11 A. I know there was other people, but I
12 can't remember who they were.

13 Q. Were these other people that were in the
14 room, did they ask you any questions?

15 A. I don't remember that. I don't remember
16 if they did or not.

17 Q. Did you do anything to prepare for this
18 interview you had with the FBI?

19 A. What do you mean "prepare"?

20 Q. Like did you review any documents, do
21 any, quote/unquote, "studying" before the
22 interview?

23 A. I don't remember if they gave us
24 anything.

1 Q. Okay. Different from if the FBI gave you
2 documents during the interview, I was wondering did
3 you independently review any documents in
4 preparation for the interview.

5 A. Like I said, I don't remember if I had
6 anything to even -- no.

7 Q. Okay. So you don't recall if you
8 reviewed any documents prior to the interview, and
9 you don't recall if the FBI or whoever else was
10 there tendered you any documents during the
11 interview?

12 A. Yes, I don't. I don't recall.

13 Q. Do you recall if the, I guess, testimony
14 or the answers you gave to the FBI, was that the
15 same information that you provided to the Grand
16 Jury?

17 A. I don't remember exactly what was, you
18 know, the content of everything. So I wouldn't be
19 able to tell you if it was the same thing. I know
20 it was in regards to the Laquan McDonald shooting.

21 Q. Sure. And I'm not asking you to recall,
22 you know, word-for-word responses, but just would
23 there be any reason for your testimony before the
24 Grand Jury to be different from what you told the

1 FBI in substance?

2 A. It shouldn't be, no.

3 Q. Was the testimony you gave before the
4 Grand Jury and the answers you provided to the FBI
5 the same as what was reflected in your statement
6 attributed to you in the Exhibit 6, the Case
7 Supplementary Report?

8 A. Well, can you ask that question again?

9 Q. Sure. Yeah. The information that
10 you -- well, we'll break it up then in two parts.

11 In the interview with the FBI, they asked
12 you a number of questions, correct?

13 A. Yes.

14 Q. Your answers to those questions, were
15 they the same in substance as to what is attributed
16 to you in Exhibit 6, the Case Supplementary Report?
17 It's a --

18 A. I don't know if they were the exact same
19 questions, so I wouldn't -- I wouldn't know if the
20 answers are the same.

21 Q. Okay. But just in substance, subject
22 matter, would there be any reason for your
23 responses to the FBI interviewers and what was
24 attributed to you in the Case Supplementary Report,

1 would there be any reason for them to be different?

2 A. No.

3 Q. Same question as regards to your Grand
4 Jury testimony and what is attributed to you in the
5 Case Supplementary Report. Is there any reason why
6 those two would be any different?

7 A. No.

8 MR. BROWN: Okay. That's all my questions.

9 FURTHER EXAMINATION

10 BY MS. ANSARI:

11 Q. Officer Mondragon, had you ever testified
12 in a Grand Jury before?

13 A. Yes.

14 Q. Not just related to Laquan McDonald.

15 A. Oh.

16 Q. Any, any Grand Jury ever before?

17 A. I can't remember if I have.

18 Q. Do you remember if you have ever
19 testified in a Federal Grand Jury? So, you know,
20 there is the Grand Jury at 26th and Cal, the state
21 cases, and Federal Grand Jury.

22 Have you ever testified in a Federal
23 Grand Jury before?

24 A. I'm not sure. I probably have, but I

1 don't want to say, but I probably have.

2 MS. ANSARI: Okay. I am ready to move on to
3 the night of the shooting. Do you guys need a break
4 or anything?

5 THE INTERVIEWEE: Huh-uh.

6 MS. RUSSELL: No.

7 MS. ANSARI: Okay.

8 BY MS. ANSARI:

9 Q. So, Officer Mondragon, you were present
10 when Laquan McDonald was shot on October 20, 2014,
11 correct?

12 A. Yes.

13 Q. Walk us through your actions immediately
14 following the shooting. So McDonald is shot, then
15 what happens? What do you do personally?

16 A. Well, I was driving that night and as,
17 you know, he was shot, I step out of my car, I
18 noticed there's traffic coming from behind us, and
19 we started directing traffic.

20 Q. What -- can you describe where you were
21 directing traffic more specifically for the record?

22 A. Right at where we were, where -- you
23 know, where we were stopped.

24 Q. Okay.

1 A. Right --

2 Q. What side of the street was that,
3 the -- whatever --

4 A. I don't even know if we were on the side
5 or if we were in the middle.

6 Q. Okay. So you were directing traffic for
7 cars coming which way?

8 A. They were coming southbound on Pulaski.

9 Q. Okay. Did you receive any direction to
10 direct the traffic, or you on your own initiative
11 got out of your vehicle to start directing traffic?

12 A. Like I said, as soon as I stepped out, I
13 turned and I saw the cars coming that way, so
14 that's when I started to direct traffic.

15 Q. Did your partner, Officer Sebastian, also
16 start directing traffic?

17 A. I believe so.

18 Q. Were there any other officers in the area
19 immediately following the shooting also directing
20 traffic?

21 A. That I don't know.

22 Q. You didn't see any other officers also,
23 you know, telling others to move over?

24 A. No.

1 Q. Do you not know if other officers were
2 directing traffic, or there were no other officers
3 directing traffic?

4 A. I don't know. I wouldn't remember.

5 Q. Did you ask any cars that witnessed the
6 shooting to move along and to drive away?

7 A. What do you mean "that witnessed the
8 shooting"?

9 Q. For any traffic that was there when the
10 shooting occurred, did you direct them away from
11 the scene?

12 A. No. Like I said, we directed the
13 traffic that was coming down the bridge.

14 Q. So any traffic that was actually present
15 when the shooting occurred, you did not direct them
16 away from the scene?

17 A. Not that I remember.

18 Q. Did you see any other officers directing
19 any civilian witnesses to the shooting to leave the
20 scene?

21 A. That I wouldn't know.

22 Q. So how long after the shooting were you
23 directing traffic for, approximately?

24 A. I don't know.

1 Q. Was it less than an hour?

2 A. It could happen -- like said, I'm not
3 sure.

4 Q. Was it three hours?

5 A. No.

6 Q. Was it two hours?

7 A. That, I -- like I said, it wasn't three
8 hours.

9 Q. Okay. Did it seem like a long time?

10 A. Like I said, I don't remember how long
11 we were directing traffic.

12 Q. So when you stopped directing traffic,
13 were you given an order to do that, or what
14 happened after you were done directing traffic?

15 A. After that, I don't remember. I
16 probably walked back to my car.

17 Q. Why did you stop directing traffic?

18 A. I don't remember.

19 Q. Was it because there was other officers
20 coming to the scene to do it?

21 A. Yeah, I don't remember if that was it or
22 they had taped it all off or --

23 Q. Okay. So you said after you were done
24 directing traffic, you walked back to your car,

1 correct?

2 A. Yes.

3 Q. Did you get inside your car, or were you
4 standing outside your car?

5 A. I don't remember.

6 Q. So following the shooting, aside from
7 your partner, Officer Sebastian -- so for these
8 next group of questions, I am only going to talk about
9 the scene of the shooting. So we won't talk about
10 when you went back to the area. We'll kind of keep
11 it -- all of the questions are really like what
12 happened while you were out there at -- out there.

13 So following the shooting to when you
14 left the scene, who did you talk to during that
15 period, outside of your partner, Officer Sebastian?

16 A. I don't remember exactly who.
17 I remember the technician for the camera came by;
18 but other than that, I don't remember who else.

19 Q. Did you talk to any sergeants at the
20 scene?

21 A. I don't remember.

22 Q. Did you talk to Sergeant Franco?

23 A. I don't remember.

24 Q. Did you talk to Commander David

1 McNaughton?

2 A. I don't remember.

3 Q. Do you remember if Sergeant Franco was at
4 the scene?

5 A. I don't remember if he was there.

6 Q. Do you remember if Officer David
7 McNaughton was at the scene?

8 A. Officer?

9 Q. Or Commander. I apologize.

10 A. No, I don't remember.

11 Q. Are you familiar with the term OCIC, so
12 officer command -- when a shooting happens, there
13 is a commanding officer who comes out to the scene
14 and kind of directs everything that is happening
15 there?

16 MR. BROWN: Officer in charge or something like
17 that.

18 BY THE INTERVIEWEE:

19 A. Oh, I -- no.

20 BY MS. ANSARI:

21 Q. Are you not familiar with that term or
22 whoever that person is?

23 A. No.

24 Q. Do you know Officer David McNaughton --

1 or Commander. I apologize.

2 A. I mean, I don't know him. I mean, he's
3 the commander, but personally, no, I don't --

4 Q. But you know who he is?

5 A. I know who he is, yes.

6 Q. And what about Sergeant Franco?

7 A. Yes, I know who he is.

8 Q. Has he on occasion been your direct kind
9 of supervising sergeant?

10 A. On other occasions?

11 Q. Is he your supervisor?

12 A. Yes, he's a sergeant. Yes.

13 Q. But you don't know if he was the sergeant
14 on scene that night?

15 A. No.

16 Q. And you don't recall talking to Sergeant
17 Franco or Commander McNaughton?

18 A. No, I don't.

19 Q. So you said you recall talking to the
20 technician. Who else do you recall talking to?

21 A. That's about it.

22 Q. What about any detectives?

23 A. I don't recall. I don't -- I don't
24 remember talking to the detectives.

1 Q. You don't recall talking to Detective
2 David March?

3 A. No.

4 Q. Do you have any reason to believe you did
5 not talk to Detective David March?

6 A. Honestly, I don't even know who he is,
7 so no.

8 Q. You don't have any reason to -- I am
9 going to ask that again, but, you know, as we have
10 talked about earlier today, we gave you documents
11 that show -- that are a Case Supplementary Report
12 created by Detective David March and also
13 handwritten notes of Detective David March's
14 interview or conversation that he had with you.

15 So do you have any reason to believe you
16 did not speak to him?

17 A. Like I said, I don't remember if I spoke
18 to him.

19 Q. Okay. So you don't remember if you spoke
20 with him, but do you have any reason to believe
21 that you did not speak with him?

22 A. I'm sure I spoke to him at some point,
23 but I don't remember where or when.

24 Q. Okay. So you're not sure -- I apologize.

1 You're not sure if you spoke to him at
2 the scene of the shooting?

3 A. I'm not sure. Yeah.

4 Q. But you know at some point you spoke to
5 him that night?

6 A. At some point, yes.

7 Q. It might have been at the scene or it
8 might have been at some other area?

9 A. Yes.

10 MS. RUSSELL: She spoke to some detective that
11 night.

12 BY MS. ANSARI:

13 Q. Did you speak with your partner, Officer
14 Sebastian?

15 A. Speak to her about --

16 Q. About anything. What did you talk to --
17 after the shooting, with your partner Officer
18 Sebastian?

19 A. On the scene?

20 Q. Uh-huh.

21 A. I did -- we didn't really talk. She
22 was -- I don't know where she was, but I was on
23 the -- on the other side. So --

24 Q. On the other side directing traffic?

1 A. Of the vehicle -- no. No. No. Just
2 standing out there.

3 Q. So she was standing on one side of the
4 vehicle, and you were standing on the other side?

5 A. Like I said, we were just walking back
6 and forth. I mean, I don't know exactly where she
7 was, but --

8 Q. Did you have any conversations regarding
9 what you saw in the shooting -- with the shooting?

10 A. Not that -- no, I don't remember.

11 Q. Did you make any kind of statements like,
12 "Oh, wow, that was crazy. I can't believe we just
13 saw that"? Any statements kind of just even in
14 passing to Officer Sebastian?

15 A. I don't remember.

16 Q. So the technician you spoke to at the
17 scene, what was his name?

18 A. I don't -- I don't know.

19 Q. Do you remember, was it a man or a woman?

20 A. I don't remember. You know, I know it
21 was a male.

22 Q. It was a male?

23 A. Uh-huh.

24 Q. Do you remember if it was a very, very

1 tall male?

2 A. Oh, that I wouldn't remember. I know it
3 was a male.

4 Q. Okay. Because the person we think it
5 might be is a big, imposing, tall person. So you
6 don't recall?

7 A. I don't recall.

8 Q. Okay. So what was the -- can you
9 describe the interaction with the technician from
10 start to finish?

11 A. I remember he approached me and said who
12 he was. He said if he could look at the in-car
13 camera and if I could play it for him. I said yes.
14 I put it where it was to play. I stepped out of
15 the car. He sat down, and he -- whatever -- I
16 don't know what he did after that.

17 Q. So during the shooting, you can see the
18 video as it's recording -- can you see the video as
19 it's recording?

20 A. Yes.

21 Q. On your car? Okay.

22 So then the shooting happens. The
23 technician comes over. And do you show him the
24 video, or you said you rewound the video --

1 A. Like I said, he asked me if I could play
2 it for him. I put it to where he could press play,
3 and then I stepped out of the car and he sat down
4 and, I mean, he started watching it, I'm sure.

5 Q. Did you watch it with him?

6 A. No.

7 Q. About how long was he in the car getting
8 the video?

9 A. I don't know.

10 Q. Less than 30 minutes? Just a couple, a
11 couple minutes? An hour?

12 A. I don't remember.

13 Q. At the scene, you said you played the --
14 or rewound the video to the point where the
15 shooting was -- or where did you rewind the video
16 to?

17 A. No. I said I put it to where he played
18 it. I showed him how to go in and do it, and then
19 I left it so he could press play on it.

20 Q. Okay. Understood. What do you mean you
21 showed him where he could go in and do it?

22 A. Because there's a menu where you go in
23 and it says Menu and Playback, and then you hit
24 Playback and then the -- whatever videos are stored

1 are up there. So I just clicked on that one
2 and --

3 Q. So you pinpointed the correct video and
4 played that?

5 A. Yes.

6 Q. Okay. Did you at the scene watch the
7 video at all, after the shooting, that came from
8 your car? At the scene of the shooting, after the
9 shooting, in between the shooting, when it happened
10 and when you left to go to the area, did you ever
11 watch the video?

12 A. I don't remember watching it.

13 Q. You don't remember, or you did not?

14 A. I don't remember.

15 Q. Okay. Do you think it's unlikely you
16 watched it or likely you probably watched it?

17 A. I think the first time I watched it is
18 when I went for the FBI, when they showed it to me.

19 Q. Okay. Got it. So that's what we're
20 trying to get at.

21 Okay. I am going to go through the
22 officers at the scene of the shooting and ask you
23 questions about them.

24 At the scene of the shooting, you said

1 you probably talked to -- well, so your partner
2 Officer Sebastian was at the scene of the shooting,
3 correct?

4 A. Yes.

5 Q. What is your relationship with Officer
6 Sebastian? How long have you worked together? Do
7 you socialize outside of work?

8 A. I mean, we've been partners for a couple
9 years. I don't know exactly how long. And what
10 was the other question?

11 Q. Do you socialize with Officer Sebastian
12 outside of work?

13 A. No. We -- you know, no.

14 Q. You don't get together with your families
15 or --

16 A. No.

17 Q. -- anything like that after work?

18 A. No.

19 Q. Outside of work?

20 And she is your regular partner, correct?

21 A. Yes.

22 Q. Okay.

23 A. We also have another partner. There's
24 three of us in the car.

1 Q. And who is that person?

2 A. Anthony Wilson.

3 Q. Okay. How does it switch on and off
4 between the two --

5 A. Well, we work four days. Two I work
6 with her; two I work with him.

7 Q. And you said you have been partners with
8 Officer Sebastian for a couple years?

9 A. Yes.

10 Q. More than five? Less than five? More
11 than ten?

12 A. I don't know exactly. I mean, you would
13 have to ask them and see exactly when we started
14 working.

15 Q. When did you start with the police force?

16 A. April 2nd, I want to say, 2007.

17 Q. 2007? Did you start directly in
18 8th District?

19 A. Yes.

20 Q. And you have been there the whole time?

21 A. Yes.

22 Q. Has Officer Sebastian been your partner
23 since you started, since 2008?

24 A. Like I said, I know we've been partners

1 almost since I started, but I don't know exactly
2 how long.

3 Q. Okay. But --

4 A. Yes.

5 Q. -- the majority of the time. Okay.

6 A. And we had other partners.

7 Q. Right.

8 A. So it's not just like we've been
9 partners -- we have had other partners in the car.
10 So --

11 Q. Understood. Did you at the scene of the
12 shooting speak at all with Officer Jason Van Dyke?

13 A. No.

14 Q. What was your relationship with Officer
15 Van Dyke prior to October 20, 2014?

16 A. He was a coworker.

17 Q. Were you ever interviewed in the context
18 of other complaints made against him?

19 A. Interviewed by whom?

20 Q. Anyone? I mean, if someone -- if
21 another -- if a citizen made a complaint against
22 Officer Van Dyke, have you ever been interviewed in
23 relation to that?

24 A. I don't remember, but -- I don't know

1 why I would be interviewed about --

2 Q. Okay. Have you ever worked with Officer
3 Van Dyke? Has he ever been your partner assigned
4 to you at all?

5 A. That I can't remember. I don't --
6 I don't know if we ever even worked once or not.
7 I don't know.

8 Q. How often do you see him at work? Every
9 day? Once a week, approximately?

10 A. Well, we have different day-off groups,
11 so I can't tell you exactly when I see him, you
12 know.

13 Q. Do you ever socialize outside of work
14 or --

15 A. Yeah, well, if we have a different day
16 off -- like I said, I don't know, but it would be
17 maybe a day or two. Depends what nights he's off,
18 I'm off. Since we rotate, it's different.

19 Q. You're on the same watch, though,
20 correct?

21 A. Same watch, yes.

22 Q. Do you ever socialize with him outside of
23 work?

24 A. If I ever socialized with him?

1 Q. Yeah. Yeah.

2 A. Once we had a picnic, like the FOP
3 picnic. He was there.

4 Q. But never -- nothing outside of that?

5 A. No.

6 Q. Did you speak with Officer Joseph Walsh
7 at the scene of the shooting?

8 A. I don't recall if I did.

9 Q. Have you ever worked with Officer -- has
10 Officer Walsh ever been your partner?

11 A. That I -- like I said, you know, I
12 wouldn't -- I wouldn't know unless you asked
13 whoever puts us -- I've been there so for so many
14 years, I don't want to say no and if I did work
15 with him. I don't remember.

16 Q. Did you ever socialize with Officer Walsh
17 after work?

18 A. No.

19 Q. Or outside of work.

20 Did you speak with -- actually, for
21 Officer Walsh, do you recall him coming over to you
22 and Officer Sebastian the night of the shooting
23 asking you guys to call another officer, an Officer
24 Geisbush, and tell him to stop bothering Van Dyke?

1 A. Not to me, no.

2 Q. Okay. Did you speak with Officer Ricardo
3 Viramontes at the scene of the shooting?

4 A. I didn't even know they were there.

5 Q. So you didn't even know he was at the
6 scene of the shooting. Okay.

7 Do you ever socialize with Officer
8 Ricardo Viramontes outside of work?

9 A. No.

10 Q. Did you speak with Officer Dora Fontaine
11 at the scene of the shooting?

12 A. I didn't even know she was there.

13 Q. Do you ever socialize with her outside of
14 work?

15 A. No.

16 Q. Does she live in your neighborhood?

17 A. I don't know exactly where she lives.

18 Q. Okay.

19 MS. RUSSELL: I want to just interject quickly.

20 You know, do you ever socialize outside of work is
21 different -- her answer, I think, is different than
22 have you ever one time socialized outside of work.

23 I just want to make sure that is crystal clear. You
24 know, if the question is, "Have you ever socialized

1 out of work," or, "Have you ever one time gotten
2 together outside of work," they are two different
3 questions.

4 BY MS. ANSARI:

5 Q. Yeah. What we are trying to get at is do
6 you have a relationship with these people --

7 A. Oh, no.

8 Q. -- outside of just a work relationship.
9 So if some coworkers you are more friends with than
10 others, you know, sometimes your families do things
11 together, so you are actually friends. That's what
12 we are trying to get at. It's not supposed to be a
13 trick question, but you're right, it wasn't worded
14 as clearly as it should have been. So that's what
15 we were trying to get at.

16 You didn't know that Officer Dora
17 Fontaine was at the scene of the shooting, correct?

18 A. No.

19 Q. Okay. Did you speak with Officer Thomas
20 Gaffney at the scene of the shooting?

21 A. I don't recall if I did.

22 Q. Do you know if he was at the scene of the
23 shooting?

24 A. Yes, they were there.

1 Q. Do you have a -- do you socialize with
2 him outside of work?

3 A. No.

4 Q. Is he, you know, more than just a work
5 colleague?

6 A. No.

7 Q. Did you speak with Officer Joseph
8 McElligott at the scene of the shooting?

9 A. I don't recall if I talked to him.

10 Q. Do you know if he was at the scene of the
11 shooting?

12 A. He was there.

13 Q. Do you socialize with him outside of
14 work?

15 A. No.

16 Q. Did you talk to Officer Arturo Becerra at
17 the scene of the shooting?

18 A. I don't know who that is.

19 Q. So you don't know who Officer Arturo
20 Becerra is?

21 A. No.

22 Q. How about Officer Leticia Velez?

23 A. No.

24 Q. So you stated that you don't recall

1 speaking to Detective David March at the scene of
2 the shooting.

3 Do you recall speaking to any detectives
4 at the scene?

5 A. Like I said, I know I probably spoke to
6 a detective, but I don't know who, and I don't know
7 when.

8 Q. Okay. Did you talk to an FOP
9 representative at the scene of the shooting?

10 A. I don't remember.

11 Q. Did you see Officer Sebastian talk to any
12 detectives at the scene?

13 A. I really don't know. No.

14 Q. Okay. Those are my questions for the
15 scene.

16 MR. BROWN: Okay.

17 MR. BROWN: I have a couple of follow-up
18 questions.

19 FURTHER EXAMINATION

20 BY MR. BROWN:

21 Q. I know you stated that you and your
22 partner kind of took it upon yourselves to kind of
23 direct traffic after the incident occurred; is that
24 correct?

1 A. Yes.

2 Q. I was wondering, were you and your
3 partner ever ordered by anyone to do anything else
4 on the scene?

5 A. I don't remember.

6 Q. Were you ever ordered to do any paperwork
7 while you were on the scene?

8 A. I don't remember. No, I don't think so.

9 Q. Would it have been, I guess, odd for you
10 to have to do some sort of reports after observing
11 a shooting?

12 A. For us to do reports?

13 Q. Yes.

14 A. No.

15 Q. No. Do you have any recollection of
16 having to do any sort of reports either that night
17 or subsequent days after the shooting?

18 A. No, I don't.

19 Q. You spoke a little bit about the video
20 technician that came by to look at your --

21 A. Yes.

22 Q. -- your vehicle. I know you said you
23 didn't know who that person was, but I was
24 wondering, had you ever seen that person before?

1 A. No, because, like I said, I don't know
2 who it was.

3 Q. Oh, no. I totally get it. You might not
4 know his name, but I thought you might have seen
5 him at other scenes or seeing him at the district
6 or something like that.

7 A. No.

8 Q. Was that technician in uniform?

9 A. I don't remember. I don't -- no, I
10 don't remember.

11 Q. Do you have any recollection if he was a
12 detective or a sergeant?

13 A. No, I don't.

14 Q. I wanted to ask, what process do you have
15 to do to initiate playback on the video in your
16 vehicle?

17 A. What do you mean "what process"?

18 Q. Well, like let's say you wanted
19 to -- you --

20 MS. RUSSELL: The steps.

21 BY THE INTERVIEWEE:

22 A. Oh, you just hit -- there's a Menu box.
23 You hit the menu, and then like four different
24 things come up. One of them says Playback. You

1 hit on the playback, and then it shows you the
2 videos that are stored, and then you click on the
3 one you want to watch.

4 BY MR. BROWN:

5 Q. Okay. And the videos that are available
6 for playback, are they only from that day, like
7 your tour of duty?

8 A. That I wouldn't know, because, you know,
9 sometimes if they don't upload, they might sit
10 there. So --

11 Q. So there's a chance that there could be
12 videos from other days, other officers who have
13 used the vehicle prior to you?

14 A. Yes.

15 Q. When you want to -- you described those
16 steps that you would take to look at the video.
17 When you would do that, would you have to log in to
18 the system?

19 A. Initially, we log in to the camera, yes.

20 Q. So somebody has to be logged in before
21 this playback of the video is going to occur?

22 A. Yes. You have to turn it on.

23 MS. RUSSELL: Well, let me make sure.

24

1 BY THE INTERVIEWEE:

2 A. Oh yeah, well, we log in once, you know,
3 you start your tour, you log in, and that's how the
4 camera comes up.

5 BY MR. BROWN:

6 Q. Do you have to do any additional log-in
7 steps to do the playback of videos?

8 A. No. It's our -- once you're logged in,
9 it's there.

10 Q. Do you know if the software to the video,
11 does it have a counter on it on how many times a
12 video is shown?

13 A. I don't know. I don't know that.

14 Q. When you review a video in your vehicle,
15 will it have your PC number at the bottom while it
16 is playing?

17 A. I don't know. I don't remember if it's
18 at the bottom or not.

19 Q. You noted that you had multiple police
20 officer partners during your tenure at the
21 8th District, correct?

22 A. Yes.

23 Q. Can you state that Officer Sebastian has
24 been your partner for the majority of your time,

1 your tenure at the 8th District?

2 A. Yes.

3 Q. Do you and Officer Sebastian text each
4 other or e-mail each other outside of work?

5 A. Yes.

6 Q. How often do you text or e-mail each
7 other outside of work?

8 A. Oh, I don't know.

9 Q. Is it every day?

10 A. I don't know. It could be.

11 Q. Well, let's just look at the last -- this
12 last week. Did you text Officer Sebastian every
13 day outside of work?

14 MS. RUSSELL: I am going to object because this
15 isn't relevant to any of the allegations before this
16 officer.

17 Go ahead and answer.

18 BY THE INTERVIEWEE:

19 A. Like I said, I don't know how many
20 times.

21 BY MR. BROWN:

22 Q. You don't know for -- okay.

23 How many times would that be different
24 from just that you guys text or e-mail each other

1 every day outside of work?

2 A. Yeah, we text.

3 Q. Every day?

4 A. Like said, I --

5 MS. RUSSELL: Outside of work?

6 BY THE INTERVIEWEE:

7 A. Outside of work? I don't know if every
8 day, but we text.

9 BY MR. BROWN:

10 Q. Okay. So it's more than once?

11 A. Yes.

12 MR. BROWN: Okay. That's all the follow-up I
13 had.

14 MS. RUSSELL: Could we take a break?

15 MR. BROWN: Yes. The time is 11:28, and we are
16 going to go off the record.

17 (Whereupon, a break was taken from
18 11:29 to 12:03 p.m.)

19 MR. BROWN: Time is 12:03, and we are back on
20 the record.

21 MS. ANSARI: Officer Mondragon, I am going to
22 start with questions regarding --

23 MS. RUSSELL: Could we go off the record one
24 more minute.

1 MR. BROWN: The time is 12:03, and we are going
2 to go off the record.

3 (Whereupon, a break was taken from
4 12:03 to 12:04 p.m.)

5 MR. BROWN: The time is 12:04, and we are back
6 on the record.

7 FURTHER EXAMINATION

8 BY MS. ANSARI:

9 Q. So, Officer Mondragon, before the break
10 we were talking about your experiences at the scene
11 of the Laquan McDonald shooting. I am going to
12 move to now what happened when you got to the area.

13 About how long were you at the scene
14 after Laquan McDonald got shot before you left?

15 A. I can't give you an exact time. I don't
16 know.

17 Q. Was it a couple hours?

18 A. Couple hours.

19 Q. Couple hours. Okay.

20 Do you remember if it was maybe after
21 midnight or 1:00 in the morning, 2:00 in the
22 morning?

23 A. When we went to the area?

24 Q. Yeah.

1 A. I don't remember what time it was.

2 Q. When you went to the area, who did you go
3 with?

4 A. My partner.

5 Q. And you both -- did you drive?

6 A. I drove, yes.

7 Q. And you drove your squad car?

8 A. Yes.

9 Q. On the way to the area, did you and your
10 partner, Officer Sebastian, talk about what you had
11 seen, the shooting?

12 A. I don't remember what we talked about.
13 I remember we talked about that we were hungry.

14 Q. Okay. And can you just walk me through
15 what happened when you got to the area? And where
16 is the area, by the way?

17 A. Oh, that's a good question. I want to
18 say -- I can't remember when, which area we went
19 to.

20 Q. Was it 51st and --

21 A. Yes.

22 Q. -- Wentworth?

23 A. 51st and Wentworth, yeah.

24 Q. So if you could just walk me through what

1 happened when you first got to the area, where did
2 you go, who did you talk to, what did you do until
3 when you left, just as a general narrative.

4 A. We got to the area. We went upstairs.
5 We sat, you know, or I sat by the computers, and I
6 don't remember who I talked to.

7 Q. How long were you waiting at the area
8 before you were interviewed by IPRA?

9 A. I don't know how long.

10 Q. So you said you went upstairs?

11 A. Uh-huh.

12 Q. Were you with your partner Officer
13 Sebastian?

14 A. Yes.

15 Q. Were there other officers there also?

16 A. There were other officers, yes.

17 Q. Do you remember who?

18 A. I remember that is the first time I saw
19 Dora and Rick.

20 Q. So you saw Dora Fontaine and Ricardo
21 Viramontes at the area?

22 A. Yes.

23 Q. Did you see Officer Joseph Walsh?

24 A. I don't remember if he was there.

1 Q. Did you see Officer Jason Van Dyke?

2 A. I don't remember.

3 Q. Did you see Officer McElligott?

4 A. I don't remember if he was there.

5 Q. Did you see Officer Gaffney?

6 A. I don't remember if he was there too.

7 Q. So the three people that you know were at
8 the area were your partner, Officer Sebastian, Dora
9 Fontaine and Ricardo Viramontes?

10 A. Yes.

11 Q. And then the other officers I named could
12 have been there, might not have been there; you
13 don't know?

14 A. Yeah, I don't know.

15 Q. Okay. So right when you got there, you
16 said you went upstairs. Were you in a waiting room
17 or the main area, or what kind of -- what does the
18 area look like?

19 A. No. Upstairs is their -- the
20 detectives. It's -- I mean, it's just the office
21 upstairs -- not an office, but it's -- they got all
22 this desks and computers. Just a detective area.

23 Q. And you said you sat by a computer?

24 A. Yes.

1 Q. Were you sitting with any of the other
2 officers, or were you by yourself?

3 A. Well, like I said, we were sitting in
4 the area. There was other officers in the area,
5 yeah, but I was sitting at -- not at the computer,
6 but at the chair where there was a computer.

7 Q. Did you do anything on the computer, or
8 you were just sitting there?

9 A. I don't remember if I did.

10 Q. Like, check your e-mail or anything like
11 that?

12 A. Yeah, I don't remember if I did that or
13 not.

14 Q. Outside of just kind of -- well, do you
15 remember talking to any of the officers, anyone
16 there, about the substance of what you saw with the
17 shooting?

18 A. I don't remember talking to anybody.

19 Q. Did you talk to any detectives at the
20 area?

21 A. That I don't remember if I did.

22 Q. Did you talk to Detective March at the
23 area?

24 A. I don't know who Detective March is, so

1 I don't -- I wouldn't know if I talked to him or
2 not.

3 Q. Do you have any guess about when you gave
4 your -- so, you know, we have the documents you
5 were provided by IAD, the case supplementary
6 statement and the handwritten notes, and those were
7 created by Detective David March.

8 Do you have any sense about when he would
9 have talked to you or any -- you know, at the
10 scene, at the area?

11 A. Talked to whom?

12 Q. Talked to you.

13 A. Talked to a detective?

14 Q. Yeah, or any detective. When did you at
15 some point talk to a detective and tell them --

16 A. Like I said, I don't know if I talked to
17 a detective on the scene or at the area. I can't
18 remember.

19 Q. Do you remember giving a statement at
20 all?

21 A. I don't -- I don't remember that.

22 Q. Did you talk to any FOP representatives
23 at the area?

24 A. I don't remember if I did.

1 Q. Were there any FOP representatives at the
2 area?

3 A. I believe there was.

4 Q. Did they get you guys dinner?

5 A. Yeah. They had pizza -- I don't know if
6 it was them, but there was pizza there.

7 Q. Okay.

8 MS. RUSSELL: Could we take a quick break?

9 MS. ANSARI: Yeah.

10 MR. BROWN: It's 12:10, and we'll go off the
11 record.

12 (Whereupon, a break was taken from
13 12:10 to 12:12 p.m.)

14 MR. BROWN: The time is now 12:12 p.m., and we
15 are back on the record.

16 MS. RUSSELL: Okay. The officer wanted to just
17 add --

18 THE INTERVIEWEE: Now, you asked about the
19 detective? Like I said, I don't know if I talked to
20 one on the scene or at the area. And another thing
21 I don't know is if it was Detective March or another
22 detective.

23 BY MS. ANSARI:

24 Q. But you do remember talking to a

1 detective at some point?

2 A. Yes, at some point. I'm just not sure
3 where or, like I said, I'm not sure if it was even
4 him or any other detective.

5 Q. And you remember giving a statement about
6 what you saw in terms of the shooting?

7 A. Yes.

8 Q. Okay. So back to who you talked to at
9 the area, you may have talked to a detective at the
10 area, but that may have been on the scene?

11 A. Yes.

12 Q. And you didn't talk to any of the
13 other -- you don't remember talking to any of the
14 other police officers?

15 A. No, I don't remember.

16 Q. Okay. But you do remember an FOP
17 representative being there getting pizza, correct?

18 A. No. I remember there was pizza there.

19 Q. Okay.

20 A. There was an FOP representative. Now,
21 if they got it, I don't know.

22 Q. Can you explain -- I guess it seems like
23 you don't remember a lot of stuff, but you remember
24 that you got pizza. Why does that stick out, out

1 of every other thing that happened?

2 A. Because, like I said, we were hungry.

3 Q. Right. So every other thing that
4 happened didn't stick out to remember, but dinner
5 did?

6 A. Yes.

7 Q. So you were at the area. And were you
8 interviewed by IPRA at the area?

9 A. Yes.

10 Q. The Independent Police Review Authority.
11 Do you remember how long you were waiting
12 before you were interviewed by IPRA?

13 A. I don't remember how long.

14 Q. Was it -- do you remember about what time
15 they interviewed you?

16 A. I don't.

17 Q. Was it early in the morning?

18 A. I --

19 Q. Had you been waiting three or four hours?

20 A. I don't know how long we were waiting
21 there.

22 Q. While you were waiting or at any time
23 while you were in the area, did you view the video
24 of the shooting?

1 A. Not that I remember, no.

2 Q. Did you view any video?

3 A. No.

4 Q. You stated earlier that the first time
5 that you probably viewed video after the shooting
6 was in preparation for your Grand Jury statement,
7 correct?

8 MS. RUSSELL: I think her testimony was when
9 she met with the FBI was the first time she viewed
10 the video.

11 THE INTERVIEWEE: Yes, that's when I saw it for
12 the first time.

13 BY MS. ANSARI:

14 Q. So you believe that the first time you
15 saw the video of the shooting was when you met the
16 FBI?

17 A. Was when -- yes.

18 Q. So before that you had not seen any video
19 of the shooting, before you met with the FBI
20 until -- before you met with the FBI, you had not
21 seen the video of the shooting, correct?

22 A. I had probably glanced at it. Remember
23 when I told you I put it for the tech guy, but not
24 seen it, no.

1 Q. Okay. Understood.

2 When you were interviewed by the
3 detective, either at the area or at the scene -- do
4 you remember being interviewed, talking to a
5 detective more than once, or do you believe it was
6 only once that you gave a statement to a detective
7 at any point that evening?

8 A. Like I said, I don't remember what --
9 you know, like, if I talked to -- but I'm sure it
10 was once.

11 Q. Have you ever witnessed a police-involved
12 shooting before October 20, 2014?

13 A. Not that I recall.

14 Q. Have you ever witnessed any shootings
15 before October 20, 2014?

16 A. Not that I recall.

17 MS. ANSARI: Kris, do you have any questions
18 about the area?

19 MR. BROWN: I have a couple questions.

20 FURTHER EXAMINATION

21 BY MR. BROWN:

22 Q. When you were at the area, you noted that
23 Viramontes and Fontaine were there. Did you
24 overhear anything they spoke about?

1 A. No.

2 Q. Did you overhear anything that any of the
3 other officers that might have been there spoke
4 about?

5 A. Not that I remember.

6 Q. Did you ever leave the room at the area
7 that had the pizza?

8 A. What do you mean?

9 Q. You described to us you guys got there,
10 when you got there you saw Viramontes and Fontaine,
11 there was a pizza at some point brought by someone
12 to the area. I want to know, did you ever leave
13 that room on the second floor where you guys were?

14 A. Other than when I went to give my IPRA
15 statement, no.

16 Q. Yeah. I'm sorry. Other than the IPRA
17 statement, do you recall going to any other rooms?

18 A. No, I don't recall. No.

19 Q. And the IPRA statement, was that like a
20 side interview room; do you recall?

21 A. I know it was in a room, but I don't
22 know exactly where it was.

23 Q. It was a room on the second floor
24 somewhere?

1 A. I don't remember if it was on the second
2 floor, but it was in the area.

3 Q. A room in the area?

4 A. Yes.

5 Q. So if you had went into a different room
6 in the area for a reason other than the IPRA
7 statement, would you have recalled that?

8 A. Yes.

9 Q. Okay.

10 A. Oh, maybe I used the bathroom.

11 Q. Oh, yeah.

12 A. Well, I'm just saying because I think I
13 remember I used the bathroom.

14 Q. Yeah, I'm sorry. I should have
15 clarified.

16 When you did talk to a detective,
17 wherever that might have occurred, area or on the
18 scene, do you recall how long that conversation was
19 with the detective?

20 A. No.

21 Q. Do you recall it being a Q and A with the
22 detective?

23 A. Being a what?

24 Q. I'm sorry, a question and answer session

1 where the detective would ask you something and
2 then you would respond?

3 A. No, I don't recall.

4 Q. Do you recall if the detective asked you
5 to give a narrative as to what occurred that
6 evening?

7 A. No, I don't.

8 Q. Do you recall having to clarify any of
9 your answers or any of the conversation you had
10 with the detective?

11 A. No.

12 Q. Did the detective that spoke with you,
13 did they go over what you told them? Did they kind
14 of recite what, you know, the conversation was?

15 A. I don't remember.

16 Q. The detective that spoke with you, did
17 that person have any notes, like a notepad?

18 A. I'm sure he did, but I don't remember if
19 it was a notepad or a piece of paper.

20 Q. Do you recall the detective writing
21 anything down while you were speaking to him?

22 A. I don't remember.

23 MR. BROWN: That's all the follow-up I have.

24

1 FURTHER EXAMINATION

2 BY MS. ANSARI:

3 Q. Okay. Now, we are going to go into your
4 statements to Detective March. That was the
5 detective you spoke with, at least according to the
6 documents. And we will provide you with Exhibits 6
7 and 7.

8 (Whereupon, said documents were
9 tendered to the Interviewee.)

10 BY MS. ANSARI:

11 Q. Now, Exhibit 6 has your statement and the
12 statement of your partner, Officer Sebastian.

13 A. Okay.

14 Q. If you could read both documents off
15 the -- the handwritten document and the typed one,
16 and let me know when you have reviewed or when
17 you're ready, if you have already reviewed them.

18 A. Okay.

19 Q. So the first page of Exhibit 6 says it's
20 a Case Supplementary Report. Do you know what a
21 Case Supplementary Report is? What is a Case
22 Supplementary Report?

23 A. Well, I'm guessing it's this (indicating).

24 Q. Have you seen one of these before?

1 A. This exact -- this one before?

2 Q. Yeah, the type of document -- not this
3 exact one, I apologize.

4 A. Oh.

5 Q. Have you seen these types of documents
6 before?

7 A. Not that I remember.

8 Q. Okay. Is this a document that is used by
9 police officers, or is it a document that is used
10 really only by detectives?

11 A. I would say detectives.

12 Q. Do you know what the purpose of this type
13 of report is?

14 A. No.

15 Q. Now, for the notes, those are called
16 general progress reports. Have you ever seen
17 documents like this before? Have you ever seen a
18 general progress report before?

19 A. Like this page?

20 Q. Not the exact one, just things like this,
21 handwritten notes on a -- with the heading General
22 Progress Report?

23 A. No.

24 Q. Okay. Is this a document that police

1 officers normally use?

2 A. I don't know if police officers, but it
3 says Detective Division.

4 Q. Okay.

5 A. So I'm guessing the detectives use it.

6 Q. So let's go back to Exhibit 6 and your
7 statement on -- well, it says Page 14 at the
8 bottom.

9 Does Exhibit 6 accurately reflect what
10 you said to Detective March on the night of
11 October 20, 2014?

12 A. Which one are we looking at, this one
13 (indicating)?

14 Q. Yeah.

15 A. So --

16 MS. RUSSELL: Wait. Do you want to go sentence
17 by sentence?

18 MS. ANSARI: I am going to.

19 MS. RUSSELL: Okay.

20 BY MS. ANSARI:

21 Q. So if it's easier, I can just start going
22 sentence by sentence, but as a general matter, is
23 this accurate, this statement?

24 A. I mean, it looks like --

1 Q. If there are inaccuracies, I can go line
2 by line?

3 A. Okay.

4 Q. Are there inaccuracies in this statement?

5 A. Probably, yes.

6 Q. Okay. We'll go through statement by
7 statement, and for each statement I am going ask
8 you if you made that statement and then I will ask
9 you if the statement is accurate.

10 A. Okay.

11 Q. So it's kind of a two-parter, and we'll
12 do that for each statement, and then I will ask you
13 more follow-up.

14 So the first sentence, the first little
15 paragraph is just kind of background, so we will
16 start with the first sentence in the second
17 paragraph.

18 "Officer Mondragon added that as she
19 drove westbound on 40th Street she saw Officer
20 McElligott running eastbound through the Burger
21 King parking lot."

22 Did you say this statement to Detective
23 March on the night of October 202014?

24 A. From what I recall, yes.

1 Q. Okay. Is that statement --

2 MS. RUSSELL: Hold on. Sorry.

3 BY MS. ANSARI:

4 Q. So did you make this statement to
5 Detective March on the night of October 20, 2014?

6 A. I'm not sure if the exact statement, but
7 that's accurate, yes.

8 Q. Okay. And it is accurate.

9 So when I ask you if you made that
10 statement, I guess the exact -- I'm not asking for
11 the exact words, but as a general --

12 A. It's accurate.

13 Q. That's what you said?

14 A. Yes.

15 Q. And that statement is accurate, correct?

16 A. Yes.

17 Q. Okay. Next sentence: "She made a
18 U-turn," she meaning you, "made a U-turn and drove
19 back out onto Pulaski Road."

20 Did you make that statement to Detective
21 March?

22 A. Yes.

23 Q. Is that statement accurate?

24 A. Yes.

1 Q. "Mondragon turned southbound onto
2 Pulaski."

3 Did you make that statement?

4 A. To the best of my knowledge, yes.

5 Q. And is that statement accurate?

6 A. Yes.

7 Q. "She saw Laquan McDonald running
8 southbound on Pulaski in the middle of the street."

9 Did you make that statement to Detective
10 March?

11 A. It's accurate. Yes.

12 Q. And -- but did you make that statement?

13 A. Maybe not the exact same, but yes, I
14 made the statement. Yes.

15 Q. And is that statement accurate?

16 A. Yes.

17 Q. "As she got closer, she could see
18 McDonald was holding a knife in his right hand."

19 Did you make that statement to Detective
20 March?

21 A. Yes.

22 Q. Is that statement accurate?

23 A. Yes.

24 Q. "He was waving the knife."

1 Did you make that statement to Detective
2 March?

3 A. Yes.

4 Q. Is that statement accurate?

5 A. Yes.

6 Q. "Officer Mondragon saw Officers Joseph
7 Walsh and Jason Van Dyke outside of their police
8 vehicle."

9 Did you make that statement to Detective
10 March?

11 A. Yes.

12 Q. Is that statement accurate?

13 A. Yes.

14 Q. "She heard the officers repeatedly
15 ordering McDonald to drop the knife as McDonald got
16 closer and closer to the officers continuing to
17 wave the knife."

18 Did you make that statement to Detective
19 David March?

20 A. So I made part of the statement to the
21 detective, but, you know, where it says "drop the
22 knife," yes. Now, where it says "got closer and
23 closer to the officers continuing to wave the
24 knife," those were not my exact words.

1 Q. So what did you say?

2 A. I don't remember exactly what I said.

3 Q. What do you remember happening? Like,
4 why is this statement inaccurate?

5 A. Because I probably said, you know, he
6 was walking on -- you know, going forward
7 southbound.

8 Q. Did you not say that McDonald was getting
9 closer and closer to the officers?

10 A. I don't remember saying it, you know,
11 like that.

12 Q. And --

13 MS. RUSSELL: I think what she may be trying to
14 articulate is that, you know, by "closer and
15 closer," it doesn't mean that he was walking
16 towards, but as he was proceeding --

17 THE INTERVIEWEE: He was walking, you know,
18 just going ahead, moving forward.

19 BY MS. ANSARI:

20 Q. Okay. So I want to kind of tease this
21 out because, obviously, this is important and we
22 want to get it right for the record.

23 So the statement says that you heard the
24 officers repeatedly ordering McDonald to drop the

1 knife as McDonald got closer and closer to the
2 officers continuing to wave the knife. So we'll
3 take this in parts.

4 You heard the officers repeatedly
5 ordering McDonald to drop the knife. Did you say
6 that to Detective March, just that first part?

7 A. Yes, I --

8 Q. And did that happen? Is that accurate?

9 A. Yes.

10 Q. So we will kind of move on from there.

11 Now, the part that says "as McDonald got
12 closer and closer to the officers," you're not sure
13 if you said that to Detective March or not,
14 correct?

15 A. Correct.

16 Q. Okay. But now you know that is not -- or
17 but that is not accurate, correct? "As McDonald
18 got closer and closer to the officers"?

19 A. Like I said, when -- he was moving
20 forward. He was --

21 Q. So "as McDonald got closer and closer to
22 the officers" is not accurate because McDonald was
23 moving forward, not getting closer to the officers.
24 Is that what you're trying to say?

1 A. Well, here's the thing. I don't know
2 what "closer" -- I don't know by whatever -- but
3 whenever it says "closer and closer to the
4 officers," I don't know if they were trying to say
5 that he was, like, approaching them, like he kept
6 walking towards, you know, not -- he was going
7 southbound towards where the officers were.

8 Q. Okay. So this statement, "as McDonald
9 got closer and closer to the officers" is not
10 specific enough -- scratch that.

11 So your statement is that McDonald was
12 walking southbound?

13 A. He continued southbound, yes.

14 Q. But he wasn't getting closer and closer
15 to the officer -- but he wasn't moving towards the
16 officers, like coming at them, correct?

17 A. Like I said, he's continuing to walk
18 southbound where the officers are.

19 Q. Okay. We'll get into this probably a
20 little bit later, but we might come back to this.

21 But is the part "continuing to wave the
22 knife," did you say that to Detective March,
23 that --

24 A. He was waving the knife?

1 Q. That Laquan McDonald was continuing to
2 wave the knife as he was --

3 A. It doesn't say "continuing." It says he
4 was waving the knife.

5 MS. RUSSELL: Well, down here (indicating).
6 BY THE INTERVIEWEE:

7 A. Oh, down here. Oh, you're down here?
8 Yes.

9 BY MS. ANSARI:

10 Q. Okay. So you stated that to Detective
11 March?

12 A. To the detective, yes.

13 Q. To the detective. And is that accurate?

14 A. Yes.

15 Q. As you were placing your vehicle
16 transmission into park -- "As she was placing her
17 vehicle transmission into park, Mondragon looked
18 down and heard multiple continuous gunshots without
19 pause."

20 Is that what you told Detective March
21 that night?

22 A. So where it says that I put the car into
23 transmission, looked down, and heard multiple --
24 now, that "continuous gunshots without pause" I

1 don't remember. I remember I said several shots.

2 Q. Okay. So what part of this sentence is
3 wrong, what part is right? Because there are a
4 couple parts in the sentence. Can you just
5 explain?

6 A. I mean, when I put the vehicle into
7 park, "looked down and heard multiple." Now, the
8 "continuous without a pause," I don't recall saying
9 that.

10 Q. Okay. So as you were placing your
11 vehicle transmission into park, "Mondragon looked
12 down and heard" -- well, it says -- but you looked
13 down and then you heard gunshots?

14 A. Several shots, yes.

15 Q. Okay. You heard several shots. But
16 you're not sure whether it was continuous gunshots
17 without pause?

18 A. I don't remember.

19 Q. So are you saying there could have been a
20 pause between the gunshots?

21 A. I don't remember.

22 Q. Do you remember saying this to Detective
23 March?

24 A. I don't remember saying it.

1 Q. But what would be an accurate statement?

2 A. Like I said, that I looked down and
3 heard several shots.

4 Q. Okay. And it's because you don't know if
5 you heard continuous gunshots without pause,
6 correct?

7 A. Yes.

8 Q. The next sentence, "Mondragon then saw
9 McDonald fall to the ground."

10 Did you say that to Detective March?

11 A. Exact here like this?

12 Q. Did you say that to Detective March?

13 A. Oh, yes. Sorry.

14 Q. Did you say that to Detective March, to
15 the detective?

16 A. To the best of my knowledge, yes.

17 Q. And is that statement accurate?

18 A. Yes.

19 Q. Mondragon did not know who fired the
20 shots.

21 Did you say that to Detective March?

22 A. Yes.

23 Q. Is that statement accurate?

24 A. Yes.

1 Q. I want you to look at the statement
2 attributed to Officer Sebastian. It's the page
3 before. And then kind of compare it to, well, the
4 first line in your statement. If you see, the
5 first line in your statement, it says, "Janet
6 Mondragon stated that she was a Chicago police
7 officer assigned to the 8th District. Mondragon
8 related the same facts as her partner, Officer
9 Daphne Sebastian."

10 Do you see in the report where it says
11 that?

12 A. Yes.

13 Q. Did you relate those same facts to the
14 detective on the night of October 20, 2014?

15 A. Relate what facts?

16 MS. RUSSELL: These (indicating).

17 THE INTERVIEWEE: Oh.

18 BY THE INTERVIEWEE:

19 A. So for the most part, it is, you know,
20 what I said. There's two things that, you know, my
21 partner probably said I didn't.

22 BY MS. ANSARI:

23 Q. Okay. And what are they?

24 A. The one that says McDonald to drop

1 the -- "McDonald ignored the verbal directions and
2 continued to advance on the officers waving the
3 knife."

4 Q. Okay. And you did not say that, you
5 said, correct?

6 A. Correct.

7 Q. Is that accurate?

8 A. Like I said, he proceeded southbound,
9 so --

10 Q. But he wasn't coming at the officers?

11 A. The officers were there where he
12 was -- you know, he was proceeding going towards
13 the -- where the officers were.

14 Q. Okay. What is the other line?

15 A. The one where it says, "Sebastian did
16 not know who fired the shot" -- not that one.

17 "Which were fired in one continuous
18 group."

19 Q. You did not say that?

20 A. No.

21 Q. Like we said before.

22 And the reason is because you're not sure
23 how the shots were fired, correct?

24 A. Yes. I remember there were several

1 shots, but --

2 Q. You don't know if they all happened in a
3 row or --

4 A. I don't know.

5 Q. Is it possible there was a pause between
6 shots?

7 A. I don't know.

8 Q. You don't remember that?

9 A. No.

10 Q. Okay. So I am going to go into your
11 allegations. This is going to be very repetitive
12 of what we just talked about, but we will proceed
13 how we will go through it.

14 MS. RUSSELL: So I just want to make sure the
15 record is clear on this issue of advancing to the
16 officers, coming close to the other officers,
17 whatever the other statement was. I think that, you
18 know, the officer is trying to say that the offender
19 continued walking southbound in the direction where
20 the officers were.

21 If the question is did he charge at the
22 officers, was he perpendicular with the officers, I
23 don't think that that's what her testimony is, but
24 continuing walking southbound when the officers are

1 further southbound is consistent with what she saw.

2 Officer, is that --

3 THE INTERVIEWEE: Yes.

4 MS. RUSSELL: -- accurate? Okay.

5 MS. ANSARI: Okay. And we understand that, but
6 you're right, for the record it is getting -- we do
7 need to kind of get that. I understand what you are
8 trying to say. We are trying to figure out the
9 right words to put it on the record.

10 Before we get into the allegations, do
11 you have any questions?

12 MR. BROWN: I did have a quick one that was
13 going to try to clean up that portion.

14 FURTHER EXAMINATION

15 BY MR. BROWN:

16 Q. So I just want to make sure I got this
17 part right. You did not tell the detective the
18 words "closer and closer"?

19 A. No.

20 Q. Is that accurate?

21 A. Yes.

22 Q. You believe you stated to the detective,
23 "McDonald was continuing to walk southbound"?

24 A. Yes.

1 Q. On the same note, you believe you did not
2 use the words "continuous gunshots without pause"
3 when speaking to the detective?

4 A. Yes.

5 Q. Right?

6 Your statement -- or, well, what you
7 believe you told the detective was that Mondragon
8 looked down and heard multiple gunshots?

9 A. I believe I said several.

10 Q. I'm sorry. Several gunshots. Okay.

11 Did we cover all the inaccuracies in this
12 statement that is attributed to you?

13 A. To the best of my knowledge, yes.

14 MR. BROWN: I think that's good for now.

15 MS. ANSARI: I have a couple questions.

16 FURTHER EXAMINATION.

17 BY MS. ANSARI:

18 Q. Did you say anything to the detectives
19 that is not reflected in this statement; not in
20 Sebastian's, but your statement? Is there anything
21 in here that you said, besides what you have
22 already told us, that is not in this statement?

23 A. What do you mean?

24 Q. So did you say anything to the detective

1 that is not written here, besides what you already
2 told us?

3 A. Not that I recall.

4 Q. You said Detective March, or the
5 detective, you didn't say that McDonald got closer
6 and closer to the officers; you said he was
7 continuing to walk southbound.

8 So do you think the detective just made
9 up that statement?

10 A. Here's the thing. I can't speak for
11 him. You would have to ask him that question.

12 Q. Did the detective that was interviewing
13 you ever try and get you to change anything that
14 you were saying?

15 A. No.

16 Q. Okay. So what you told him, you know,
17 you never felt any pressure from the detective
18 interviewing you to have your report line up with
19 other officers?

20 A. No, not that I remember. No.

21 Q. Okay. We can get into the allegations.
22 So that is Exhibit 3. We are going to start with
23 Allegation No. 2.

24 A. Okay.

1 Q. "It is alleged that on or about
2 October 20, 2014, you made a false statement during
3 an interview with Detective March when you stated
4 that you saw McDonald running southbound on Pulaski
5 in the middle of the street waving a knife."

6 Do you stand by this statement that is
7 attributed to you? Do you stand by this statement?

8 A. Yes.

9 Q. "It is alleged that on or about
10 October 20, 2014, you made a false statement during
11 an interview with Detective March when you stated
12 that you heard officers Walsh and Van Dyke
13 repeatedly ordering McDonald to drop the knife as
14 McDonald got closer and closer to the officers
15 continuing to wave the knife."

16 We discussed this already, but do you
17 stand by this statement? And you can clarify like
18 you did. All right?

19 A. Like I said, I'll stand until where it
20 says "drop the knife." Now, where it says getting
21 "closer and closer," like I said, he was walking
22 southbound towards where the officers were.

23 Q. "It is alleged that October 20, 2014, you
24 made a material omission during an interview with

1 Detective March when you failed to state that
2 McDonald changed the direction in which he was
3 walking prior to the shooting."

4 Why didn't you tell the detective that
5 McDonald changed the direction he was walking prior
6 to the shooting?

7 A. What do you mean "changed the
8 direction"?

9 Q. So on the video -- which you viewed,
10 correct?

11 A. Yes.

12 Q. And, you know, the whole -- a lot of
13 people have seen. The video looks like it shows
14 McDonald -- it shows McDonald walking southbound on
15 the street and then turning, moving away from the
16 officers, so southeast, walking southeast?

17 A. Well, he was always walking southbound.
18 He never turned back and walked back or anything,
19 that's what this is saying that he changed the
20 direction.

21 Q. Okay. So --

22 A. Changing direction would be like he
23 would turn and go back the other way, or -- I mean,
24 maybe if he went a little bit, you know, to the

1 side, but he was always just going straight, you
2 know -- not straight, but southbound.

3 Q. Okay. So your response to that
4 allegation is that McDonald continued to walk
5 southbound; he did not change direction?

6 A. I did not observe him change direction.

7 Q. "It is alleged that on or about
8 October 20, 2014, you made a material omission
9 during an interview with Detective March when you
10 failed to state that Officers Walsh and Van Dyke
11 moved towards McDonald prior to the shooting."

12 Why didn't you tell Detective March that
13 they moved towards McDonald prior to the shooting?

14 A. What do you mean "moved towards"?
15 I didn't see them.

16 Q. So you didn't see Officers Walsh and
17 Van Dyke move towards Laquan McDonald prior to
18 Laquan being shot?

19 A. No.

20 Q. So you didn't see Officers Walsh and
21 Van Dyke make -- did you see Officers Walsh and
22 Van Dyke make any motion towards Laquan McDonald,
23 move at all towards McDonald?

24 A. Not that I remember, no.

1 Q. "It is alleged that" -- oh.

2 MS. RUSSELL: Well, I'm sorry.

3 MS. ANSARI: Sorry.

4 THE INTERVIEWEE: They got out of their
5 vehicle. Is that what you mean?

6 MS. ANSARI: No, but --

7 THE INTERVIEWEE: Okay.

8 MS. ANSARI: That's fine.

9 BY MS. ANSARI:

10 Q. "It is alleged that on or about
11 October 20, 2014, you made a false statement during
12 an interview with Detective March when you stated
13 that as you were placing your vehicle transmission
14 into park, you looked down and heard multiple
15 continuous gunshots without pause."

16 Do you stand by this statement?

17 A. Again, for the most part, yes. When it
18 comes down to the continuous without a pause, I
19 don't recall saying that.

20 Q. So --

21 A. I heard several shots.

22 Q. Okay. "It is alleged that on or about
23 October 20, 2014, you made a false statement during
24 an interview with Detective March when you stated

1 that you did not know who fired the shots."

2 Do you stand by this statement?

3 A. Yes. I didn't know.

4 Q. So I want to ask you, how did you not see
5 who was shooting? Why did you not see who was
6 shooting?

7 A. I was -- you know, I was driving, and I
8 was focused on Laquan.

9 Q. Okay.

10 A. So everything, you know, happened so
11 fast. I saw them get out of the car. Next thing
12 you know, I put it on park, and that was it.

13 Q. So did you see Laquan actually being
14 shot, or you didn't even see that?

15 A. I don't recall if I actually saw -- like
16 I said, I put it on park, heard the shots. He fell
17 to the ground.

18 Q. But did you -- so you saw him standing
19 and then fall to the ground?

20 A. I don't -- I don't know. I don't
21 remember.

22 Q. You don't know?

23 A. No.

24 Q. Do you remember -- you said you heard

1 multiple shots, correct?

2 A. Yes.

3 Q. How many shots did you hear?

4 MS. RUSSELL: Well, she knows now it's 16.

5 THE INTERVIEWEE: Right.

6 BY MS. ANSARI:

7 Q. But you didn't know at the time how many
8 shots you heard?

9 A. No, I didn't know at the time. Like I
10 said, it was several.

11 Q. All right. And you said -- you didn't
12 hear any pauses between the shots?

13 MS. RUSSELL: And she knows now there was a
14 pause. Okay?

15 MS. ANSARI: Right. Right.

16 BY MS. ANSARI:

17 Q. So at the time, did you not --

18 A. No. No.

19 Q. You did not recall hearing a pause
20 between the shots.

21 Did you -- you said you had never
22 witnessed a shooting before, correct?

23 A. Not that I remember, no.

24 Q. Would you think that witnessing a

1 shooting would be something that would stick in
2 your memory?

3 A. I mean, I'm sure it would, but --

4 Q. But it isn't really right now?

5 A. No.

6 Q. Okay. And you have worked with Officers
7 Walsh and Van Dyke before, correct, so they're
8 in -- you know them?

9 A. They're coworkers. They work in the
10 area.

11 Q. And they're coworkers. Okay. So two of
12 your officers are, you know, in front of you, your
13 car is facing them, and their guns are drawn with
14 an offender, facing an offender, and you look down
15 at your transmission and then look up and the
16 shooting is over? Is that what you were saying?
17 Is that what happened?

18 A. I don't know if that's exactly what
19 happened, but yeah, I looked down, shots were
20 fired, he fell to the ground, and, I mean, that's
21 it.

22 Q. I guess I'm trying to understand, you
23 know, this is -- at least from an outsider's
24 perspective, from a perspective of the public and

1 us and after reviewing the video, it seems
2 surprising that you looked down during the
3 entire -- you looked down to place your car into
4 park during the entire shooting. You didn't see
5 anything really of McDonald being shot, correct?
6 Is that what you're saying?

7 MS. RUSSELL: I think from your review of the
8 video and all the analysis that has been done, you
9 know 16 shots takes seconds. So if you are
10 asserting that the officer took more than that time
11 to put her car in park, I don't know. The video
12 speaks for itself.

13 I'm sure you can tell from it when
14 exactly the transmission was put in park.
15 I think -- I don't know what the question was. How
16 can you not remember this, or how could you look
17 down in putting your car into park? What was the
18 question?

19 BY MS. ANSARI:

20 Q. I'm wondering how you can't remember
21 this, what --

22 MS. RUSSELL: Well, I don't think that is an
23 appropriate question, but answer it if you can.

24

1 BY THE INTERVIEWEE:

2 A. I mean, I don't remember it. So if I
3 don't remember it, I don't remember it.

4 MS. RUSSELL: I would also say that this
5 officer has been interviewed by the federal agents
6 about this, the State's Attorney's Office, the
7 Independent Police Review Authority; given Grand
8 Jury testimony; her name has been in the paper as
9 giving false reports; the video has been all over
10 the place.

11 The fact that she can't remember a
12 specific detail about, you know, whether he was in
13 the middle of the southbound lane -- the video is
14 the video. We have all seen it.

15 As you have brought up, the public
16 demands answers. Like, whether this officer can
17 directly pinpoint the exact time she put her car
18 into park, it's not surprising to me that after
19 giving 16 statements on this and having, you know,
20 every press outlet in the country providing their
21 input of what happened that she can't specifically
22 recall with that statement.

23 THE INTERVIEWEE: And -- I mean, and also it
24 happened how long ago?

1 BY MS. ANSARI:

2 Q. But you said you did not see who was
3 shooting because you were focused on Laquan
4 McDonald. Is that what you said before?

5 A. Yeah. I was looking at him.

6 Q. You were looking at the offender?

7 A. Yes.

8 Q. So you didn't notice who was shooting
9 because you were looking at the offender.

10 And to get this on the record, just to
11 try and clarify, you did see him standing and then
12 on the ground, correct, like actually fall to the
13 ground? Did you see him fall to the ground?

14 A. I don't remember.

15 Q. So you didn't see who was shooting
16 because you were focused on the offender, but you
17 did not see the offender actually fall to the
18 ground?

19 A. Like I said, I don't remember that, but
20 there was two officers with their guns drawn.

21 Q. Right.

22 A. So --

23 Q. Okay. I am going to go back to
24 Allegation 1 and just repeat that one.

1 On or about October 20, 2014, you
2 provided a false narrative to Detective David March
3 concerning the McDonald shooting through a series
4 of false statements and material omissions.

5 Besides the corrections that you have
6 already made, do you stand by your statement to
7 Detective --

8 | A. To the detective, yes.

9 FURTHER EXAMINATION

10 BY MR. BROWN:

11 Q. I've got a couple follow-up questions.

12 In the supplemental report --
13 supplementary report, I'm sorry, the detective
14 attributes to you that, "Officer Mondragon saw
15 Officers Joseph Walsh and Jason Van Dyke outside of
16 their vehicle." You told us that was an accurate
17 statement.

18 I'm wondering how is it you saw the
19 officers get out of the vehicle, but you didn't see
20 their next -- the next immediate movements they
21 made to walk towards McDonald?

22 A. To walk towards McDonald?

23 Q. Yeah, the --

24 | A. Like I said, I saw them. They got out

1 of their vehicle. As soon as they got out, like I
2 said, I was focused, I saw them -- I mean out of
3 the corner of my eye I saw them. They get out, and
4 I was focused on him. That's when I put it on park
5 and everything else happened.

6 Q. But there is a lot of time that elapsed
7 there.

8 A. A lot of time? How much?

9 MS. RUSSELL: How much? How much time?

10 MR. BROWN: Okay. Well, that's --

11 MS. RUSSELL: I mean, what does the video show?

12 MR. BROWN: We will show the video to help.

13 BY MR. BROWN:

14 Q. But just plainly speaking, just I'm
15 trying to understand. You saw them get out of the
16 car. The very next movements they made were
17 walking towards McDonald. I'm just wondering, how
18 did you not see it? Did you want to not see them,
19 did you --

20 A. Like I said, I -- I don't know. No.

21 Q. After --

22 A. I saw them get out, out of the corner of
23 my eye, then, you know, I looked at Laquan, put my
24 car in park, and everything happened. When you're

1 saying there's time, obviously, when you're out
2 there, seconds are nothing. You know, when you're
3 sitting here, yeah, we sit here for 30 seconds and
4 it feel like an eternity.

5 Q. But after reviewing the video, would you
6 say that the officers --

7 A. I can't speak for them.

8 Q. No. I mean, now that you have had the
9 opportunity to review the video, you know, after
10 the fact and in preparation for this interview,
11 would you say that Officers Walsh and Van Dyke did
12 make steps towards McDonald after getting out of
13 their vehicle?

14 MS. RUSSELL: Are you asking what her memory is
15 or whether she observed that on the video?

16 MR. BROWN: Whether she observed that on the
17 video.

18 MS. RUSSELL: Do you want to watch the video
19 and see if we can see that?

20 BY THE INTERVIEWEE:

21 A. I mean, I don't remember. Like I said,
22 I remember them getting out of the car. That's it.

23 MS. RUSSELL: I mean, I guess we would say the
24 video speaks for itself. She has testified to what

1 she remembers. The video speaks for itself.

2 MR. BROWN: And we will show the video in a
3 little bit, but I just thought it would be easy just
4 to say, yes, I saw them walking towards McDonald or
5 no, I didn't see them walking --

6 THE INTERVIEWEE: Like I said, I saw them get
7 out of their car; I looked at Laquan; the next thing
8 you know, everything happened. So, I mean, the
9 video shows -- like she said, the video shows
10 whatever is there. So --

11 BY MR. BROWN:

12 Q. When you say "the video shows whatever is
13 there," do you have --

14 A. Well, you're saying that they got out
15 and they -- you know, they went -- I didn't see
16 that. You're saying that you saw that in the
17 video.

18 FURTHER EXAMINATION

19 BY MS. ANSARI:

20 Q. So you didn't see that?

21 MS. RUSSELL: How could she testify to it if
22 she didn't see it?

23 BY THE INTERVIEWEE:

24 A. Here's the thing. I don't -- yeah, I

1 didn't -- I saw them get out of the car, and that's
2 it.

3 FURTHER EXAMINATION

4 BY MR. BROWN:

5 Q. And I'm not saying about that day on
6 October 20th. I'm just asking in preparation for
7 this interview, you reviewed the video, correct?

8 A. I didn't -- no, I didn't see the video.

9 Q. In preparation for today's interview?

10 A. For today?

11 Q. Yes.

12 A. No.

13 Q. You didn't review the video?

14 A. No.

15 Q. I mean, you had seen it at some point
16 prior to today, correct?

17 A. Yes, I said I saw it when I went for the
18 FBI.

19 Q. Right. Past seeing it for the FBI, have
20 you seen it after that?

21 A. No.

22 Q. You only saw it the one time after --

23 A. Well, and on TV, of course.

24 Q. Okay. So what I was just trying to get

1 at is from you seeing the video after the fact,
2 would you say that Officer Walsh and Van Dyke made
3 steps toward McDonald?

4 A. Here's the thing. Like I said, in the
5 video, I mean, I don't know. You might see it. If
6 you show it to me, I'll tell you, oh, yeah, it
7 looks like they're -- but that -- to me? No, I saw
8 them get out of the car, and that's it.

9 Q. I think we keep going around the same
10 issue. I wasn't trying to get to your recollection
11 that night. I was actually asking about --

12 A. Well, like I said, I haven't seen the
13 video. So if you show it to me, I will tell you,
14 yeah. But other than that, no.

15 Q. Okay. We will show you the video in a
16 little bit.

17 You noted that you put your transmission
18 in park, correct?

19 A. Yes.

20 Q. You noted that you were looking down,
21 correct?

22 A. Yes. I looked down to put the car in
23 park.

24 Q. Were you looking at anything in

1 particular?

2 A. I just looked down to where -- no.

3 Q. Were you looking at the video as it was
4 happening on your screen?

5 A. I don't remember. No.

6 Q. How long does it take to put your car in
7 park?

8 A. I don't -- I don't know.

9 Q. The vehicle you were driving on
10 October 20, 2014, you had driven that vehicle prior
11 to that day, correct?

12 A. Yes.

13 Q. What type of vehicle was it?

14 A. I believe it was a Ford Explorer.

15 Q. Give us an estimate of how many times you
16 have given that Ford Explorer prior to October 20,
17 2014.

18 A. I have no clue.

19 Q. More than two times?

20 A. I don't know. Several.

21 Q. Several? Is that 50 times?

22 A. I don't know. Several times.

23 Q. So definitely more than one?

24 A. Yes.

1 Q. Safe to say you won't agree to any number
2 more than one; you're just going to say several?

3 A. Uh-huh.

4 Q. So you have had practice putting the car
5 into park multiple times, correct?

6 A. Yes.

7 Q. How long does that normally take?

8 A. I don't know.

9 Q. Is it something you have to think about,
10 how to put the car in park?

11 A. Well, what do you mean "to think about"?

12 Q. Well, I'm just trying to figure out
13 how -- is it a difficult process to put the car in
14 park?

15 MS. RUSSELL: I am going to object at this
16 point. I think this is harassment of this witness,
17 badgering, and not related to the allegations that
18 she has already answered.

19 BY MR. BROWN:

20 Q. I am just trying to get an understanding
21 of the effort it takes to put the car in park.

22 A. Well, I don't know how long it would
23 take to put in park.

24 Q. I'm not asking for the exact to the

1 millisecond how long it takes, but would you say it
2 takes one second?

3 A. I don't know. Okay. It might take a
4 second. It might take two.

5 Q. Okay. It might take one or two seconds.

6 So seeing how it might take one or two
7 seconds to put the car in park, after the car was
8 put in park on the night of October 20, 2014, why
9 didn't you look back up after the car was put in
10 park?

11 MS. RUSSELL: I think she stated that she
12 looked down, put the car in park, she looks up,
13 McDonald's down. I mean, why didn't she -- yeah, I
14 mean --

15 BY THE INTERVIEWEE:

16 A. That I don't know. I mean -- I wouldn't
17 know. I don't know.

18 BY MS. ANSARI:

19 Q. And I know that's what you have stated,
20 but just thinking of the timeline, if it's several
21 seconds for the 16 shots to occur --

22 A. I don't know.

23 Q. No, I'm just -- just let me finish it
24 out, and then you can answer.

1 You see Walsh and Van Dyke get out of the
2 car. You put your vehicle in park or you are
3 starting to do that. You look down. You hear the
4 shots. There's a number of seconds that go by
5 and -- well, we'll look at the video and count, but
6 we're going to estimate ten seconds --

7 MS. RUSSELL: We're not counting. We're not
8 counting.

9 MR. BROWN: Okay.

10 MS. RUSSELL: The video's got its own timer, as
11 we know.

12 MR. BROWN: Oh, sure. I'm sorry.

13 MS. RUSSELL: Yeah. We're not counting.

14 MR. BROWN: I misstated it.

15 BY MR. BROWN:

16 Q. We are not going to count. We will just
17 go by whatever is on the video. But my estimation
18 was just trying to figure out when the shots
19 started and when they ended. My estimation was ten
20 seconds.

21 So that's what I was trying to get
22 from -- it took you one to two seconds to put the
23 car in park, and you looked down. What was going
24 for those other eight seconds?

1 A. I don't know.

2 Q. I mean, you've got two coworkers outside
3 dealing with a situation that is serious. Their
4 guns are drawn.

5 MS. RUSSELL: Is that a question for her?

6 MR. BROWN: Yeah. I was going follow it with a
7 question.

8 BY MR. BROWN:

9 Q. Is that a situation that you would like
10 to observe?

11 A. Like I said, I don't know, I don't
12 remember why I didn't look up.

13 Q. Did you consciously not want to look up?

14 A. I don't -- I don't remember, so no,
15 I -- if I don't know why I didn't look up, no.

16 Q. I'm just trying to give you an
17 opportunity to explain it. Just to --

18 A. Well, and I'm just trying to tell you.
19 I mean, if I didn't look up, I don't remember why.
20 I don't know why. So I can't give you an answer.
21 You are asking me, you know. I can't give you an
22 answer. I don't know why.

23 Q. Okay. Then your statement is your
24 statement. It is just from my reading of it, that

1 was one of the questions that popped into my mind,
2 what happened, how come she didn't look up. That
3 doesn't seem reasonable, but I just wanted to ask
4 you to get your response to that.

5 A. Okay.

6 MR. BROWN: Okay. I guess --

7 FURTHER EXAMINATION

8 BY MS. ANSARI:

9 Q. When you were making the motion about
10 placing the vehicle into park, you went like -- is
11 the park on the steering wheel, or is it
12 a -- what's it called?

13 A. No, it's on the steering wheel.

14 Q. It's on the steering wheel. So it's like
15 when you're placing it into park, you're facing
16 forward?

17 A. Yes.

18 Q. Okay. Not looking down because it's not
19 down?

20 A. No. It's on the steering wheel.

21 MS. ANSARI: Okay. Let's watch the video.

22 MR. BROWN: Okay.

23 BY MS. ANSARI:

24 Q. So we are going to --

1 MR. BROWN: Let's go off the record for a
2 minute. It's 1:08.

3 (Whereupon, a break was taken from
4 1:08 to 1:15 p.m.)

5 MR. BROWN: So the time is now 1:15, and we are
6 back on the record.

7 BY MS. ANSARI:

8 Q. Officer Mondragon, I am now going to show
9 you a portion of the video that were recovered from
10 the in-car video system of the beat 813R vehicle.
11 This is one of the videos that the Office of
12 Inspector General provided to you on February 24,
13 2016, on a DVD.

14 Kris is going open the VLC media file,
15 which he has already done, titled Video TS.IFO on
16 his laptop. The file contains six minutes and five
17 seconds of footage. The video also has a timestamp
18 on it indicating the date and time the video was
19 recorded.

20 We are going to advance the video to the
21 portion timestamped 9:57:20. The VLC media player
22 time bar time, which again goes from zero to 6:05,
23 is at 4:38.

24 I am going to ask you to watch the video

1 once all the way through -- well, not all the way
2 through, but a certain portion of the video showing
3 the shooting. And then we will go back, and I am
4 going to ask you to identify certain portions of
5 the video that correspond to your statement.

6 We can watch the video in half speed, and
7 you can watch the video as many times as you need
8 to before identifying -- before answering my
9 questions. Okay?

10 THE INTERVIEWEE: Yes.

11 MR. BROWN: And she also means we can watch it
12 at full speed too, if that's better.

13 MS. ANSARI: Sorry. Full speed, half speed.

14 THE INTERVIEWEE: Okay.

15 MS. RUSSELL: I guess, do you want to tell her
16 what the question is? Because then she may watch it
17 different. I don't know.

18 MS. ANSARI: Yeah. So -- well, there's a
19 couple -- there will be a couple questions.

20 BY MS. ANSARI:

21 Q. But what I'm -- the first question that I
22 want to know is I would like you to point out, in
23 your statement, you said that -- or you did not say
24 McDonald got closer and closer to the officers; you

1 said that he was continuing to walk southbound. So
2 I just want you to identify the portion where
3 McDonald is walking southbound.

4 A. Okay.

5 Q. And then second, what I want to do, what
6 I would like you to do is identify when in the
7 video, as best as you can recall, you stopped
8 seeing what was happening on the video, because
9 your statement --

10 MS. RUSSELL: But the video shows McDonald the
11 entire time. So she saw McDonald the entire time.
12 So when you are saying identify when she stopped
13 looking at the video?

14 MS. ANSARI: I apologize.

15 BY MS. ANSARI:

16 Q. When you -- your statement says as you
17 were placing your vehicle transmission into park,
18 you looked down and heard what we now know is
19 multiple -- you said multiple gunshots. So what I
20 am trying to figure out is at what point in the
21 video did you look down and when did you look back
22 up, as best as you can recall.

23 So you see what's happening here on the
24 video. Laquan McDonald -- you will see what

1 happens. And, essentially, I want to know what you
2 saw and what you didn't see of what is on the
3 video.

4 A. I mean, seeing the video is not going to
5 change what my statement says. You want me to
6 pinpoint exact time? I can't.

7 Q. Well, let's watch it, and we'll stop it
8 at a certain portion and ask a question, and if you
9 don't remember, then that's fine.

10 A. Okay.

11 MR. BROWN: So you are going tell me to stop
12 when it's fine?

13 MS. ANSARI: Yeah.

14 MR. BROWN: Okay.

15 (Whereupon, a video was shown.)

16 BY MS. ANSARI:

17 Q. So is this part what you mean when you
18 say McDonald was continuing to go southbound? And
19 "this part" is at timestamp 4:44 going to 4:59.

20 MS. ANSARI: You can pause it here -- oh, I'm
21 sorry.

22 BY MS. ANSARI:

23 Q. So here --

24 A. You see he's waving the knife.

1 Q. Yeah, and here, you see him walking
2 southbound, correct?

3 A. Yes.

4 Q. Does it look like now, viewing the video
5 now --

6 MS. ANSARI: I'm sorry. Kris, can you align
7 that a little bit? This is a little --

8 MR. BROWN: Yeah, there was --

9 MS. ANSARI: This is a little -- I understand
10 this is a little awkward for me to do this.

11 (Whereupon, playback was stopped.)

12 MR. BROWN: Can you see it, Officer, if I have
13 it right here? Maybe this is easier. Then you can
14 just ask as we go.

15 BY MS. ANSARI:

16 Q. Okay. So, now, this is as we are
17 watching the video together. It is not --

18 MS. ANSARI: Well, just play it along.

19 (Whereupon, a video was shown.)

20 BY MS. ANSARI:

21 Q. So here McDonald is walking southbound.
22 And it appears from the video that he is now
23 walking away from the officers. Is that what it
24 looks like to you on the video?

1 A. Again, the video speaks for itself. You
2 see him walking southbound.

3 Q. Okay. Do you see him walking away from
4 the officers at 4:51?

5 MS. RUSSELL: This video speaks for itself.
6 She doesn't have to narrate the video for you guys.
7 The video speaks for itself.

8 MS. ANSARI: Okay.

9 BY THE INTERVIEWEE:

10 A. It looks like he's walking southbound.

11 BY MS. ANSARI:

12 Q. Okay. Now, if we could back up a little
13 here. Did you see -- okay. You said you saw
14 Officer Van Dyke and Officer Walsh get out of their
15 vehicle, which is happening at 4:48. And McDonald
16 is standing. He's on the ground.

17 (Whereupon, playback was stopped.)

18 BY MS. ANSARI:

19 Q. You said your attention was on McDonald
20 when you were at the scene. Did you see him
21 standing and then fall to the ground?

22 A. Like I said, I don't remember that.

23 Q. So your statement after viewing the video
24 is that you saw Officers Walsh and Van Dyke get out

1 of their vehicle, and then you did not see them
2 shoot or McDonald fall to the ground?

3 MS. RUSSELL: Not shoot.

4 BY MS. ANSARI:

5 Q. Sorry. You did not see Officers Walsh or
6 Officer Van Dyke -- you did not see who shot?

7 A. No, I didn't.

8 Q. And you did not see Laquan McDonald
9 standing and then fall to the ground?

10 A. I don't recall seeing him, like you
11 said, but I don't, no. I didn't see who shot.

12 MS. ANSARI: Okay. Do you have any questions?

13 (Whereupon, a video was shown.)

14 FURTHER EXAMINATION

15 BY MR. BROWN:

16 Q. I should have done a better job trying to
17 point out when it appeared the shooting started,
18 but I just wanted to make a note of when it
19 appeared that the shooting started on the player.
20 Maybe --

21 (Whereupon, playback was stopped.)

22 (Whereupon, a video was shown.)

23 (Whereupon, playback was stopped.)

24

1 BY MR. BROWN:

2 Q. So it appeared to me that maybe 4:51 or
3 52 to approximately 5:05 or 5:06 on the recording,
4 it appeared that McDonald was being shot.

5 So I wanted to ask you, is your statement
6 that you did not see any of that, the shooting,
7 because you were looking down?

8 A. I don't remember if I said because I was
9 looking down the entire time, but I didn't see the
10 shots.

11 MS. ANSARI: Are you done?

12 MR. BROWN: I'm done.

13 (Whereupon, a video was shown.)

14 (Whereupon, playback was stopped.)

15 (Whereupon, a video was shown.)

16 BY MS. ANSARI:

17 Q. Did you see Walsh kick the -- so on the
18 video, did you see Walsh kick the knife out of
19 Laquan McDonald's hand?

20 A. Right now? Right now?

21 Q. No. Just at the scene?

22 A. I don't remember.

23 Q. You don't remember seeing that. Okay.

24 MR. BROWN: Are we good with the video?

1 MS. ANSARI: Yeah.

2 MR. BROWN: We'll stop the video now.

3 (Whereupon, playback was stopped.)

4 BY MS. ANSARI:

5 Q. So we are going to move on to your
6 statement to IPRA. IPRA interviewed you about the
7 McDonald shooting, correct?

8 A. Yes.

9 Q. That interview took place on October 21,
10 2014, correct?

11 A. Yes.

12 Q. Where did that interview take place

13 A. I remember in the area.

14 Q. In the area, so area central?

15 A. 50 -- yeah, 51st and Wentworth.

16 Q. Okay. Do you remember about what time
17 that interview had occurred?

18 A. No, I don't.

19 MS. RUSSELL: We have the documents. It was at
20 0529 hours.

21 BY MS. ANSARI:

22 Q. Do you have any reason to believe that
23 the interview did not occur at 5:29 in the morning?

24 A. No, I don't.

1 Q. Okay. Who was present during that
2 interview?

3 A. Do you want --

4 Q. That you can recall? You don't have to
5 refer to the document, just that you can recall.

6 A. Oh. I know the FOP attorney,
7 the -- whoever the -- who interviewed me. I don't
8 remember if there was anybody else.

9 Q. Did you talk to the FOP attorney or the
10 FOP rep -- so the statement indicates that the FOP
11 attorney Dan Herbert was there, and FOP
12 representative Kristin Kato was there.

13 Do you remember talking to Dan Herbert or
14 Kristin Kato before you spoke with IPRA?

15 A. No, I don't remember that.

16 Q. Have you ever met them before, either of
17 them?

18 A. Not that I could recall.

19 Q. So is the first time you spoke with them
20 the first time you met them when you walked in for
21 your IPRA interview?

22 A. Yes.

23 Q. Okay. And you stated earlier that you
24 did not talk to any of the police officers that

1 were at the scene of the shooting before your IPRA
2 interview? Is that correct?

3 A. Not that I remember, no.

4 Q. Okay.

5 A. Outside, of course, my partner when we
6 talked on the way there and whatever, but --

7 Q. And you said you didn't talk with your
8 partner about any substance -- about what you saw
9 that night?

10 A. No.

11 Q. Did you make any attempt to ensure that
12 the statement you were going to provide to IPRA was
13 consistent with the statements provided by the
14 other officers who were present at the McDonald
15 shooting?

16 A. No.

17 Q. Prior to your IPRA statement, were you
18 pressured in any way to make that statement
19 consistent with the statements of the other
20 officers present at the scene?

21 A. No.

22 Q. I am going to direct your attention to
23 your IPRA statement and the allegations in
24 conjunction.

1 A. Okay.

2 Q. And we will start with the allegations
3 on -- Allegation No. 9 is where we will start. And
4 in the transcript, can I direct you to page 8 of
5 the transcript, and can you review pages 8 and 9,
6 please, would you?

7 A. And you said Question No. 9?

8 Q. No. Will you review pages 8 and 9 of
9 your statement, of the transcript, please. Then I
10 will ask you the question.

11 "It is alleged that on or about
12 October 21, 2014, you made a false statement when
13 during an interview with IPRA Investigator Killen
14 you stated that McDonald was running southbound on
15 Pulaski in the middle of the street waving a
16 knife."

17 Do you stand by your statement to IPRA?

18 A. Yes.

19 Q. So I would like to direct you to page 10,
20 lines 1 through 7 in your transcript, please.

21 A. Okay.

22 Q. "It is alleged that on or about
23 October 21, 2014, you made a false statement during
24 an interview with IPRA Investigator Killen when you

1 stated that McDonald was waving the knife when
2 Officers Walsh and Van Dyke were telling him to
3 drop it."

4 Do you stand by your statement to IPRA?

5 A. Yes.

6 Q. "It is alleged that on or about
7 October 21, 2014, you made a material omission
8 during an interview with IPRA Investigator Killen
9 when you failed to stated that McDonald changed the
10 direction in which he was walking prior to the
11 shooting."

12 Why didn't you tell Investigator Killen
13 that McDonald changed the direction in which he was
14 walking prior to being shot by Officer Van Dyke?

15 A. Like I said, he was walking southbound.
16 To me, changing direction would be if he, you know,
17 turned around, started walking northbound or east
18 or west. That's changing direction.

19 Q. "It is alleged that on or about
20 October 21, 2014, you made a material omission
21 during an interview with IPRA Investigator Killen
22 when you failed to state that officers Walsh and
23 Van Dyke moved towards McDonald prior to the
24 shooting."

1 your car was still moving slowly behind -- well,
2 your car was still moving slowly towards the scene.

3 So when McDonald was shot, was your car
4 still moving? That's what I understood to be here,
5 but I'm asking you if that's what --

6 MS. RUSSELL: Are you asking her if she stands
7 by her statement?

8 MS. ANSARI: Yes.

9 BY THE INTERVIEWEE:

10 A. Yes.

11 BY MS. ANSARI:

12 Q. So in your detective statement, you stood
13 by the statement that you were putting the car into
14 park when you heard shots being fired.

15 So was your car moving, or were you
16 putting your car into park? Which was it?

17 MS. RUSSELL: This does not say that
18 simultaneous with the shooting, are you in park, are
19 you looking, are you moving, what are you doing.
20 She stands by her statement. It is only after the
21 statement that she has been sliced and diced with
22 every subsecond, millisecond of what happened that
23 night.

24 She stands by her statement as true. She

1 has been through the detective's stuff and corrected
2 anything that was in error. There is nothing
3 inconsistent about this statement.

4 BY MS. ANSARI:

5 Q. So if you look at Page 11, lines 12 to
6 13: "After I hear the -- you know, I'm -- like I
7 said, I'm still moving, and I hear the offender
8 drop down."

9 You said, "I'm still moving." Does that
10 mean that the car was still moving? I'm just
11 asking for clarification.

12 A. I stand by my statement.

13 Q. Right. So you stand by your statement
14 that, "I'm still moving and I see the offender drop
15 down," correct?

16 A. Yes.

17 Q. So that is different from putting your
18 car into park when the offender drops down?

19 MS. RUSSELL: What second are you talking
20 about? What second are you talking about?

21 MS. ANSARI: "I see the offender drop down."
22 So that's the second --

23 MS. RUSSELL: The second that -- is it when he
24 first --

1 MS. ANSARI: "I'm still moving as I see the
2 offender drop down."

3 MS. RUSSELL: When he first drops down or in
4 the video or --

5 MS. ANSARI: He only drops down once. That's
6 what I mean.

7 MS. RUSSELL: Well, so when he first drops
8 down, what second is that? Let's see it on the
9 video.

10 MS. ANSARI: Okay.

11 MS. RUSSELL: I mean, can you slice this into
12 what second? If you are going to ask this officer
13 to slice and dice it into every second, I want to
14 see exactly the second you are going to ask her
15 whether she remembers moving, because she is
16 standing by this statement and it is not
17 inconsistent with her other statements.

18 MS. ANSARI: And for the record, we are
19 starting the video again. It is the same video that
20 we showed earlier.

21 (Whereupon, a video was shown.)

22 MS. RUSSELL: And what allegation are you
23 asking her to address?

24 MS. ANSARI: This is background. I'm trying to

1 just get information.

2 MS. RUSSELL: To what allegation? So she needs
3 to address your allegation.

4 MS. ANSARI: About not seeing who was shooting.
5 About not seeing who was shooting.

6 MS. RUSSELL: If you're asking her, "How is it
7 possible that you couldn't see," that's the
8 allegation she already answered, that she didn't
9 see.

10 (Whereupon, a video is shown
11 repeatedly throughout questioning.)

12 MS. ANSARI: So he drops down.

13 MS. RUSSELL: What exact second is that? No,
14 because this is now two, three, four seconds.

15 MR. BROWN: Let me rewind.

16 MS. RUSSELL: I mean, that is what you guys are
17 asking her to do.

18 MS. ANSARI: Right. I understand.

19 MS. RUSSELL: So I want to see the exact second
20 you are referring to.

21 MS. ANSARI: 4:55, he drops down.

22 MS. RUSSELL: Okay. So not a second before
23 that, not a second after it, you are asking this
24 second, 4:55 on this, was your car in park? What is

1 your question?

2 BY MS. ANSARI:

3 Q. I wanted to know if your car was still
4 moving when the offender dropped down. And in the
5 video, it appears --

6 MS. RUSSELL: At 4:55 seconds?

7 MS. ANSARI: Let's rewind it.

8 (Whereupon, a video was stopped and
9 then repeated.)

10 MS. ANSARI: Okay. 4:55.

11 MS. RUSSELL: Well, now we are at 4:57.

12 MR. BROWN: Well, we can --

13 (Whereupon, playback was stopped.)

14 MS. RUSSELL: What is the second? What second
15 do you want her to ask her questions about? Because
16 that is where we are at, at this point in the
17 investigation. We're second by second.

18 BY MS. ANSARI:

19 Q. Between 4:55 and 4:58, was your car still
20 moving? And we can watch it again.

21 A. I don't know.

22 Q. Okay.

23 (Whereupon, a video was shown.)

24

1 BY MS. ANSARI:

2 Q. "It is alleged that on or about" --

3 (Whereupon, playback was stopped.)

4 BY MS. ANSARI:

5 Q. So we will move on from that one.

6 "It is alleged" -- I am going to direct
7 your attention to Page 11, lines 1 through 3.

8 A. Okay.

9 Q. "It is alleged that on or about
10 October 21, 2014, you made a false statement during
11 an interview with IPRA Investigator Killen when
12 Killen asked you if you saw muzzle flashes or
13 anything like that you and you stated no."

14 Do you stand by your statement to IPRA?

15 A. Yes.

16 Q. How bright are muzzle flashes? Just a
17 background question: What does a muzzle flash
18 really look like? Is it a spark, or is it a --

19 A. I don't know. You would have to see it.

20 Q. It's just you know what it looks like;
21 it's just hard to describe here. Is that what
22 you're saying?

23 A. What do you mean if I know what it looks
24 like?

1 Q. What is a muzzle flash? When a gun is
2 being fired, are there normally muzzle flashes?

3 A. That I don't know. Sometimes.

4 Q. Okay. "It is alleged that on or about
5 October 21, 2014, you made a false statement when
6 during an interview with IPRA Investigator Killen,
7 Killen asked if everything you stated was a true
8 and accurate account of what occurred, and you said
9 yes."

10 Do you stand by your answer that you gave
11 a true and accurate account of the McDonald
12 shooting?

13 A. Yes.

14 Q. "It is alleged that on or about
15 October 21, 2014, you provided a false narrative to
16 IPRA Investigator Killen concerning the McDonald
17 shooting through a series of false statements and
18 material omissions."

19 Do you stand by your answer that you gave
20 a true and accurate account of the McDonald
21 shooting?

22 A. Yes.

23 Q. After your IPRA statement, did you get a
24 copy of your statement?

1 A. I don't remember.

2 Q. Have you made statements to IPRA before?

3 A. I don't remember. Maybe once.

4 Q. Before reviewing your IPRA statement, in
5 preparation for this OIG interview, had you
6 reviewed, seen your statement before?

7 A. What's a senior statement?

8 MS. RUSSELL: No, have you reviewed or seen it.

9 BY MS. ANSARI:

10 Q. Well, I guess, when did you first see
11 this statement?

12 A. Oh, when I got it from you guys.

13 Q. From us?

14 A. Uh-huh.

15 Q. That was the first time you had seen it?

16 A. Yes.

17 Q. Okay. Did you leave area central right
18 after you gave the IPRA statement?

19 A. I don't remember if it was right after.

20 Q. Okay. Was it shortly after?

21 A. Yes.

22 Q. And then did you go back to your district
23 with Officer Sebastian?

24 A. Yes.

1 Q. And then you went home?

2 A. Yes.

3 MS. ANSARI: Do you have any follow-up?

4 MR. BROWN: Just very brief.

5 FURTHER EXAMINATION

6 BY MR. BROWN:

7 Q. I understand as it relates to the IPRA
8 interview you have to answer questions that are put
9 to you. It's not your job to volunteer details.
10 And that's just me making a statement. It's not a
11 question.

12 But I did want to ask you, do you feel
13 that there are additional details that you would
14 have liked to have said but that Investigator
15 Killen failed to ask you the right question to
16 elicit those details?

17 A. No.

18 Q. You feel like he got an accurate picture
19 as to what your observations were from that night?

20 A. Yes. Yes.

21 Q. Okay. And just a different follow-up,
22 just on the muzzle flashes, just so I know, are
23 there some times when a gun is shot that a muzzle
24 flash doesn't happen?

1 A. Like I said, I don't know. It could,
2 yeah. It could not happen.

3 Q. Just from your experience, have you seen
4 times where a gun is being shot and there is a
5 flash and times where there isn't a flash?

6 A. Yes.

7 MR. BROWN: Okay. That was just for my own
8 edification. Thank you.

9 MS. ANSARI: Okay. I have no more questions
10 regarding your IPRA interview. I think we are ready
11 to move on to the dash cam issue. Do you guys need
12 a break?

13 THE INTERVIEWEE: No.

14 BY MS. ANSARI:

15 Q. Okay. So this is the last subject. So,
16 Officer Mondragon, what is an in-car video system
17 exactly? Can you just describe how it works, what
18 it is?

19 A. I guess the camera in the vehicle.

20 Q. Okay. Do in-car video systems also
21 capture audio?

22 A. Yes.

23 Q. Can you walk us through just, like, the
24 steps that you take as an officer using your

1 vehicle's in-car video system throughout your
2 shift? So starting -- you know, you start your
3 shift, what do you do with the system, and then
4 throughout the shift kind of what happens with the
5 system?

6 A. I mean, when you get in the video, you
7 log in, it logs in, the camera comes on, and that's
8 it.

9 Q. And then do you --

10 A. And then you --

11 Q. I'm sorry. Go ahead.

12 A. And then it just records if you turn
13 your lights on.

14 Q. So the video system, if you turn the
15 lights on, the video system automatically starts
16 recording?

17 A. Yes.

18 Q. Does it start -- can you manually start
19 recording, even if your lights aren't on?

20 A. That I don't know.

21 Q. And then at the end of the shift, do you
22 have to do anything with the video system?

23 A. Now we do.

24 Q. Before --

1 A. Oh.

2 Q. And so this is all -- sorry. To clarify,
3 all these questions will be what the procedure was
4 as of October 20, 2014, as best as you can recall.

5 A. Okay. Just log off, and you upload. It
6 has a little thing where it says Upload and, you
7 know, turn off the camera. That's it.

8 Q. Okay.

9 MS. RUSSELL: I'm sorry, Sarah. I missed that
10 question. What is the question?

11 MS. ANSARI: Can you repeat it back?

12 (Whereupon, the record was read by
13 the reporter as requested.)

14 MS. RUSSELL: Okay. Yeah. Yeah.

15 MS. ANSARI: As of October 2014.

16 BY MS. ANSARI:

17 Q. So as of October 2014, what rules or
18 regulations governed your use of the in-car
19 audio-video system?

20 A. What do you mean?

21 Q. So are there any CPD General Orders or
22 Special Orders talking about -- and this is as of
23 October 2014. Were there any CPD General Orders or
24 Special Orders governing the use of the system?

1 A. I'm sure there is, yes.

2 MS. ANSARI: Okay. We would like to introduce
3 into evidence Exhibit 8.

4 (Whereupon, Exhibit 8 was marked
5 for identification.)

6 BY MS. ANSARI:

7 Q. For the record, this exhibit is Special
8 Order S03-05, CPD Special Order regarding in-car
9 video systems, dated February 23, 2012.

10 Does this special order refresh your
11 recollection as to the in-car video system
12 protocols that were in place as of October 2014?

13 A. Yes.

14 Q. I want to direct your attention to
15 Section 6 of the Special Order titled Operational
16 Procedures.

17 A. Okay.

18 Q. Section VI A states, "Department members
19 assigned to a department vehicle equipped with an
20 in-car video system will, 1, at the beginning of a
21 tour of duty: Visually inspect the in-car video
22 system equipment for damage; obtain the remote
23 transmitter/audio recorder and ensure that it is
24 securely attached to the member's person; 3, or

1 (c), follow the start-up procedures for the in-car
2 video system as trained and ensure the system is
3 working properly.

4 "Note: Members will immediately notify a
5 supervisor if at any time the in-car video system
6 is inoperable, damaged, the equipped vehicle
7 becomes inoperable, or the remote transmitter audio
8 recorder is missing."

9 Were you aware of these procedures as of
10 October 20, 2014?

11 A. Yes.

12 Q. Yes?

13 Did you receive any training on these
14 procedures?

15 A. Yes, a long time ago.

16 Q. Do you remember when?

17 A. No. Years ago.

18 Q. Years ago?

19 A. When they first, you know --

20 Q. You started in 2008, correct?

21 A. 7.

22 Q. 2007. Okay. Was it close to when you
23 started with the --

24 A. I don't remember.

1 Q. Do you remember receiving more than one
2 training on the use of the in-car video audio
3 systems?

4 A. I don't remember.

5 Q. But you do remember a training, correct?

6 A. Yes.

7 Q. And do you remember actually seeing these
8 procedures?

9 A. I mean, I'm sure I've seen them. I --

10 Q. But you don't recall?

11 A. I don't remember, yeah.

12 Q. So have you ever had to notify a
13 supervisor regarding a damaged in-car video system?

14 A. Are you talking about now or before?

15 Q. In 2014.

16 A. 2014. So this is all before.

17 Q. Yeah, so all before.

18 A. No, I don't remember if I did.

19 Q. Okay. Do you remember your video or
20 audio system not working before or ever having to
21 do anything about it?

22 A. No, I don't remember.

23 Q. Are you familiar with the term help desk
24 ticket?

1 A. Yes.

2 Q. Okay. What is that?

3 A. It's just a -- you call for data and get
4 a ticket number if something's not working.

5 Q. So if something's not working, you
6 request a help desk ticket, correct?

7 A. Yes. You call for data.

8 Q. And have you ever requested a help desk
9 ticket before?

10 A. I don't remember.

11 Q. You were driving vehicle 8779 on
12 October 20, 2014, correct?

13 A. Yes.

14 Q. Is this a vehicle you drive regularly?

15 A. It's assigned to us, but we don't always
16 get it.

17 Q. Can you estimate about -- scratch that.
18 So vehicle 8779 is assigned to you and
19 Officer Sebastian, correct?

20 A. It's assigned to the beat.

21 Q. To beat 813R, correct?

22 A. Yes. It was.

23 Q. It was, yes, as of October 20, 2014.

24 How often have you driven that vehicle?

1 A. I don't know. Several times. Like, not
2 only do we have it, but if -- you know, afternoons
3 takes it, days takes it. So --

4 Q. Okay. But it's safe to say that you have
5 driven that vehicle several times?

6 A. Yes.

7 Q. So more than ten?

8 A. Oh, I don't know.

9 Q. Okay.

10 A. Yeah.

11 Q. And vehicle 8779 has an in-car video
12 system, correct?

13 A. That day, yes.

14 Q. That day, yes, which we know because
15 there is a video.

16 A. Yes.

17 Q. How long had you -- when you started on
18 the force in 2007, how long from then up until
19 October 20, 2014, how long had you worked in a car
20 with an in-car video system?

21 A. Oh, that I wouldn't know.

22 Q. Okay. But the majority of the time, the
23 cars had --

24 A. Like I said, it depends. Sometimes you

1 get cars that have no cameras. So I don't --

2 Q. But would you say it's like half time you
3 have a car that has a camera and half the time not?

4 A. Yeah, I wouldn't be able to tell you if
5 it's half the time or not.

6 Q. Did you ever have any issues with vehicle
7 8779's in-car audio or video system on previous
8 tours, previous before October 20, 2014?

9 A. Not that I remember.

10 Q. So on the night of October 20, 2014, can
11 you walk me through what you did at the beginning
12 of your tour of duty related to the in-car video
13 and audio system?

14 A. I don't remember if I logged in or my
15 partner logged in. I don't remember.

16 Q. But one of you logged in?

17 A. Yes.

18 Q. And then what did you do?

19 A. Nothing. You log in, and you go out and
20 patrol.

21 Q. Okay. So you log in, and then you go?

22 A. Uh-huh.

23 Q. Got it. Did you visually inspect the
24 in-car system equipment for any damage?

1 A. What do you mean, like break -- if it
2 was broken?

3 **Q. Broken?**

4 A. Broken?

5 **Q. Or if it was working?**

6 A. Honestly, I don't remember.

7 **Q. And we know that it was working, so --**
8 **that's the video system.**

9 Actually, what is your PC number? Do you
10 know that by heart?

11 A. Yes.

12 **Q. Okay. What is your number?**

13 A. [REDACTED]

14 **Q. Where do you keep the microphones for the**
15 **system?**

16 A. What do you mean?

17 **Q. Where do you keep the microphones for the**
18 **in-car audio-video system?**

19 A. It depends. I don't remember that car
20 where they kept it.

21 **Q. Are they on a cradle, or are they --**

22 A. No, they're just -- I mean, like I said,
23 I don't remember that car where they were, but
24 there's a -- how can I say it? Somewhere where you

1 just put them to charge.

2 Q. Okay. And then do you put the
3 microphones on your person before going out on the
4 tour of duty?

5 A. Yes. Now we do.

6 Q. Yeah. As of October 20, 2014?

7 A. I don't remember if I did.

8 Q. So before, before October 20, 2014, did
9 you at the beginning of a tour of duty, would you
10 put the microphone on your person?

11 A. I don't remember.

12 MS. ANSARI: I would like to mark into evidence
13 Exhibit 9 and Exhibit 10.

14 (Whereupon, Exhibit 9 and Exhibit 10
15 were marked for identification.)

16 BY MS. ANSARI:

17 Q. Okay. Exhibit 9 is the in-car camera
18 video retrieval worksheet dated October 20, 2014,
19 22:30 hours, and it states the technician is Becvar
20 who we know his name now is Sergeant Lance Becvar.
21 And Exhibit 10 is an e-mail from Lance Becvar dated
22 Friday, July 17, 2015.

23 So let's take a look at Exhibit 9. And
24 if you see at the top, it says a handwritten 813R,

1 Vehicle 8779. The 9 is a little hard to read, but
2 that's a 9. And it says PC number PC0Z400. Is
3 that your PC number?

4 A. Yes.

5 Q. And if you look lower down on the page,
6 it says, "8779: Mics In Glove Box Batteries
7 Inserted Upside Down," with an arrow below that, it
8 says, "fully op." We're assuming "op" means
9 operational.

10 And then if you take a look at the
11 e-mail, Exhibit 10. It says, "Vehicle 8779 video
12 recovered titled PC0Z400" at -- a long number. "No
13 MICs because they were in the Glove Compartment
14 with the batteries inserted upside down - Disabling
15 them."

16 Do you recall having a conversation with
17 Sergeant Lance Becvar on the night of October 20,
18 2014?

19 A. No.

20 Q. Do you recall Officer Sebastian having a
21 conversation with Sergeant Becvar?

22 A. No.

23 Q. Can you explain why the mics were in the
24 glove compartment?

1 A. I have no idea, no.

2 Q. Can you explain why the batteries were
3 inserted upside down?

4 A. No.

5 Q. Did you purposely disable the
6 microphones?

7 A. No.

8 Q. But did you check the microphones at the
9 start of your tour of duty on October 20, 2014?

10 A. I did not, no.

11 Q. You did not check the microphones?

12 A. No.

13 Q. And you did not put the microphones on
14 your person at the start of your tour of duty on
15 October 20, 2014?

16 A. No.

17 Q. What are you supposed to do if audio is
18 not functioning properly at the beginning of a
19 shift?

20 A. I don't know because we don't check for
21 audio.

22 Q. Okay. So it wasn't a practice to check
23 for audio --

24 A. No.

1 Q. -- at the beginning of your shift before,
2 as of October 20, 2014?

3 A. Before, no. Now it's different.

4 Q. Okay. So you said it wasn't your
5 practice to check for audio at the beginning of a
6 tour of duty as of October 2014, correct?

7 A. What do you mean by "practice"? You
8 mean what did I do?

9 Q. Yeah, did you usually do it?

10 A. No.

11 Q. And did your partner, Officer Sebastian?

12 A. I don't know, you would have to ask her.

13 Q. And do you know if it was a general
14 practice among other police officers to not check
15 the audio before?

16 A. I don't know.

17 Q. Have you ever been disciplined for not
18 wearing your microphone or checking the audio
19 before -- for audio not working in your vehicle?

20 A. Not that I remember, no.

21 Q. Were you surprised to hear that none of
22 the five vehicles at the Laquan McDonald scene
23 captured any audio?

24 A. If I was surprised?

1 Q. Yeah.

2 A. No.

3 Q. Why weren't you surprised?

4 A. I mean, looking -- if you see the
5 reports here, mostly, the cars, sometimes they
6 don't work, you know, you -- it's -- no, I have
7 no --

8 Q. Okay. As of October 20, 2014, was there
9 a practice of CPD officers disabling the audio
10 components of the in-car video system?

11 A. No.

12 Q. Did you ever hear of such a practice?

13 A. No.

14 Q. Okay. We can go to the allegations.

15 MS. ANSARI: Or, actually, before the
16 allegations, do you have any follow-up?

17 MR. BROWN: I do have a little follow-up.

18 FURTHER EXAMINATION

19 BY MR. BROWN:

20 Q. I wanted to ask, what was your practice
21 as it relates to the audio-video system when you
22 would receive your vehicle for the evening?

23 A. Like I said, you log in, and if the
24 camera came on, that's it, and you go on to your

1 duties.

2 Q. Did you do any additional checks,
3 like -- I guess we will separate that -- of the
4 video system?

5 A. If I did any additional checks?

6 Q. What was your normal daily practice on
7 the video system? Did you have to do any
8 additional checks other than putting your PC number
9 in?

10 A. No. Like I said, you log in and the
11 camera comes on, and that's it.

12 Q. And I think you already mentioned that
13 you didn't check the audio?

14 A. Yeah.

15 Q. Okay. How long was it your practice to
16 not check the audio on your vehicles?

17 A. I don't -- I don't know.

18 Q. Was it just a general practice? Do you
19 remember -- I'm sorry. Do you ever recall checking
20 the audio in a vehicle that was issued to you?

21 A. I don't remember.

22 Q. Ever?

23 A. I don't remember this. I probably have
24 checked it. I mean, like I said, I don't remember.

1 Q. Do you know why you would have checked
2 the audio in vehicles sometimes but not other
3 times?

4 A. Like I said, I don't even know if I
5 checked it. So I don't -- I don't know.

6 Q. Well, just based on what you just told
7 me, I thought you stated that you would check
8 sometimes. I was just trying --

9 A. No. I don't remember if I ever checked.

10 Q. So it's possible that you have never
11 checked the audio in the vehicles that have been
12 issued to you?

13 A. That's possible, yes.

14 Q. Do you know when the audio-video systems
15 were first installed in the vehicles --

16 A. No.

17 Q. -- that were issued to you?

18 A. No.

19 Q. Were they already in place when you
20 started working in the 8th District?

21 A. I don't remember. Like I said, I don't
22 know when they installed the cameras, so I couldn't
23 tell you if when I got there they were there
24 already.

1 Q. So is it safe to say that whenever the
2 audio systems were installed in the vehicles, you
3 might not have checked them because you just don't
4 recall doing that?

5 A. Yes.

6 Q. Okay. And do you have a reason why you
7 wouldn't have checked the audio system?

8 A. Like I said, if you logged in, your PC
9 came on, the camera came on, that --

10 Q. Oh, no. Video sounds fine. It sounds
11 like you checked the video. That's part of your
12 daily practice. Correct?

13 A. Now it is, yes.

14 Q. I'm talking like from October 2014 and
15 before, it sounds like your daily routine was to
16 put your PC number in and make sure the video
17 system was working, correct?

18 A. Yes.

19 Q. So I am just asking, why not the same for
20 the audio system?

21 A. I don't know. I couldn't answer that.

22 Q. Was it a conscious effort to prevent
23 there being an audio record of your police work?

24 A. No.

1 Q. You could throw it out to me. I'm just
2 trying to figure out why --

3 A. Are you trying to say that --

4 Q. No, I'm just asking. I'm not trying
5 insinuate anything, I'm just --

6 A. No. No.

7 Q. I'm sorry, we spoke over each other. I'm
8 just trying to ask, is there a reason why --

9 A. No.

10 Q. -- you wouldn't have turned on or checked
11 the audio?

12 A. No.

13 Q. But you can state that any failures to
14 not check the audio system, it's not because you
15 were trying to prevent there being a record of your
16 police work?

17 A. Exactly.

18 Q. So if there was a problem related to the
19 video system, what would be your steps after that?

20 A. What do you mean? That day?

21 Q. No. Just from October 20th and
22 before -- I'm sorry, October 20, 2014, if there was
23 a problem with your video system, how would you
24 address it? What would you do?

1 A. You would usually just notify the
2 sergeant. That's it. Let him know the camera is
3 not working.

4 Q. Would you also have to notify the
5 sergeant that the camera was working?

6 A. I don't remember if we had to before.
7 Now we do.

8 Q. So it's possible you might have told, as
9 part of your daily routine, tell the sergeant, "My
10 video system is working"?

11 A. Like I said, I don't remember before.
12 Now we do, but I don't remember before if we had to
13 tell them that it was working or not.

14 Q. As part of the notification to the
15 sergeant, would you say anything in regards to the
16 audio system?

17 A. No, not that I could remember. No.

18 Q. Would you tell the sergeant that "My
19 audio system is working," even though you might not
20 have checked it that day?

21 A. Like I said, I don't even know if we
22 were supposed to notify him. I don't remember.

23 Q. And as far as logging in to the video
24 system, at least while you were partnered with

1 Officer Sebastian, did you have to always log in?

2 A. Sometimes, yes, because her PC wasn't
3 working for a long time. So it was mostly my PC
4 number.

5 Q. So if her PC number wasn't working, is it
6 safe to say that you logged in all the time?

7 A. Not all the time; most of the time.
8 Well, like said, we had other cars. So --

9 Q. And, I'm sorry, I just meant in regards
10 to your partnership with Officer Sebastian on those
11 nights that you guys were out together.

12 A. Oh. Yes.

13 MR. BROWN: That's all I have.

14 FURTHER EXAMINATION

15 BY MS. ANSARI:

16 Q. So let's go on to the allegations. So
17 this is back to Exhibit 3. And we started at 16.
18 We started Allegation 16.

19 "It is alleged that on or about
20 October 20, 2014, you disabled the microphones for
21 CPD vehicle 8779 by placing them into the vehicle's
22 glove compartment with the batteries inserted
23 upside down."

24 What is your response to that allegation?

1 A. No, I did not disable the microphones.

2 Q. And you did not place them into the glove
3 compartment?

4 A. No.

5 Q. And you did not insert the batteries
6 upside down?

7 A. No.

8 Q. Who might have done that? Do you know
9 who did that?

10 A. I have no idea.

11 Q. "It is alleged that on or about
12 October 20, 2014, you failed to ensure the in-car
13 video system for CPD vehicle 8779 was working
14 properly at the beginning of your tour of duty."

15 What is your response to that allegation?

16 A. This is the video?

17 Q. The in-car video system. So it includes
18 video and audio, the whole system. The system as a
19 whole includes video and audio?

20 A. Oh. I mean, I didn't know the audio
21 wasn't working, but the camera was working.

22 Q. Okay. And you didn't know the audio was
23 not working because you did not check the audio,
24 correct?

1 A. Correct.

2 Q. "It is alleged that on or about
3 October 20, 2014, you failed to immediately notify
4 a supervisor that the in-car video system for CPD
5 vehicle 8779 was inoperable or damaged."

6 What is your response to that allegation?

7 A. Like I said, I did. I didn't know that
8 the audio wasn't working, so --

9 Q. "It is alleged that on or about
10 October 20, 2014, you failed to audibly record
11 events with CPD vehicle 8779's in-car video system
12 during your tour of duty."

13 What is your response to that allegation?

14 A. Not that I failed; I didn't know it
15 wasn't working.

16 Q. So you did not audibly record events on
17 your video that night?

18 A. Correct. Correct.

19 MS. ANSARI: Okay. So we're done, almost.
20 Understanding the -- do you want to take a break?

21 MS. RUSSELL: I think the officer may make a
22 statement.

23 BY MS. ANSARI:

24 Q. Understanding the nature of our

1 investigation or what -- is there anything that you
2 would like to add?

3 MS. RUSSELL: We're going to take a break.

4 MR. BROWN: The time is now 2:11, and we will
5 go off the record.

6 (Whereupon, a break was taken from
7 2:11 to 2:16 p.m.)

8 MR. BROWN: The time is now 2:16, and we are
9 back on the record.

10 MS. RUSSELL: Do you mind reading back the last
11 comment.

12 (Whereupon, the record was read by
13 the reporter as requested.)

14 MS. RUSSELL: From there, I would just note
15 that certainly this officer has no idea the nature
16 of the OIG's investigation or the extent of it.
17 With that, she would like to make a brief statement.

18 MS. ANSARI: Okay.

19 THE INTERVIEWEE: I have answered to the best
20 of my ability. I have been interviewed by federal
21 agents, the State's Attorney's Office, given a Grand
22 Jury testimony, the Independent Police Review
23 Authority on the events of that night. My name has
24 been on the paper as giving false testimony and

1 making false reports.

2 If I don't remember second by second the
3 events of that night, I apologize to the extent I
4 don't remember the exact sequence of events or
5 exactly who I talked with on October 2014. I have
6 answered truthfully that I don't recall.

7 MR. BROWN: All right. The time is 2:17, and
8 that will conclude this interview. Thank you.

9 (Whereupon, the interview concluded at
10 2:17 p.m.)

11 (Which were all proceedings in the
12 above-entitled interview this date.)
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1 STATE OF ILLINOIS)

2) SS:

3 COUNTY OF C O O K)

4

5 I, ANDREW ROBERT PITTS, C.S.R. No. 84-4575, a
6 Certified Shorthand Reporter within and for the
7 County of Cook and State of Illinois, do hereby
8 certify:

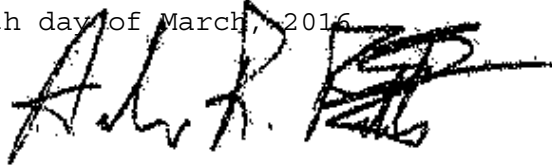
9 That previous to the commencement of the
10 examination of the Interviewee, the Interviewee was
11 duly sworn to testify the whole truth concerning
12 the matters herein;

13 That the foregoing interview transcript
14 was reported stenographically by me, was thereafter
15 reduced to typewriting under my personal direction
16 and constitutes a true record of the testimony
17 given and the proceeding had;

18 That the said interview was taken before
19 me at the time and place specified;

20 That I am not a relative or employee or
21 attorney or counsel, nor a relative or employee of
22 such attorney or counsel for any of the parties
23 hereto, nor interested directly or indirectly in
24 the outcome of this action.

1 IN WITNESS WHEREOF, I do hereunto set my
2 hand and affix my seal of office at Chicago,
3 Illinois this 24th day of March, 2016

4 
5

6
7 Certified Shorthand Reporter

8 Cook County, Illinois

9 My commission expires May 31, 2017

10
11 C.S.R. Certificate No. 84-4575.
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01/25/2014 MEMORANDUM FOR THE DIRECTOR
OF THE FBI

TO: DIRECTOR, FBI (15-0564) FROM: SAC, NEW YORK (15-0564) SUBJECT: [REDACTED]

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CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

ADVISEMENT OF RIGHTS

I, Janet Mondragon, understand that I am being interviewed by
Sarah Anson and Kristopher Brown from the City of
Chicago Office of Inspector General.

DATE 3/22/16 TIME 10:32am LOCATION 300 W. Adams St, suite 300

I understand that this interview is part of an official investigation and that I have a duty to cooperate with the Office of Inspector General, which includes answering all questions completely and truthfully.

I understand that I have no right to remain silent. I understand that I have an obligation to answer questions put to me truthfully. I understand that if I refuse to answer questions put to me, I will be ordered by a superior officer to answer the questions. I further understand and I have been advised that if I persist in my refusal to answer after an order to do so, such further refusal constitutes a violation of the Rules and Regulations of the Chicago Police Department and may serve as the basis for my discharge.

I understand and have been advised that my statements or responses may constitute an official police report. I understand that Rule 14 of the Chicago Police Department's Rules and Regulations prohibits making a false report, written or oral, and I further understand that making such a false report, whether written or oral, may result in my separation from the Chicago Police Department.

I understand that any statement made by me during this interview may be used as evidence of misconduct or as the basis for disciplinary action up to and including removal or discharge.

I understand that any statement made by me during this interview and the fruits thereof cannot be used against me in a criminal proceeding.

I understand that I have the right to have a union representative, or legal counsel of my choosing, present at the interview to consult with, and that I will be given a reasonable time to obtain a union representative or legal counsel as long as the interview is not unduly delayed.

I understand that a refusal to answer any question, or any false, inaccurate, or deliberately incomplete statement by me would constitute a violation of Chicago Municipal Ordinance 2-56, and may serve as the basis for my discharge.

I acknowledge that this statement of my administrative rights has been read aloud to me, and I have been allowed to review this document.

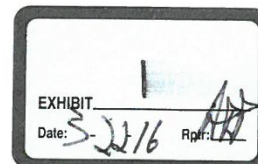
Janet Mondragon
Employee Signature

Witness: Sarah Anson Witness: _____

WAIVER

Understanding these rights, I wish to answer questions from investigators from the Office of Inspector General without having a union representative or legal counsel present. No promises or threats have been made to me and no pressure or coercion of any kind has been used against me.

Employee Signature: _____



NOTIFICATION OF INTERVIEW TO CPD MEMBER

CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL

DATE

February 24, 2016

NAME	RANK	STAR NO.	UNIT OF ASSIGNMENT
Janet Mondragon	Police Officer	4364	008

YOUR APPEARANCE IS REQUIRED

AT <input checked="" type="checkbox"/>	Amicus Court Reporters 300 West Adams, Ste. 800 Chicago, IL 60606	ON	DATE March 3, 2016	TIME 9:00 PM
--	---	----	-----------------------	-----------------

AS ☒ ACCUSED ☐ WITNESS ☐ COMPLAINANTFOR ☒ A STATEMENT

CONCERNING

False statements made in connection with the October 20, 2014 shooting of Laquan McDonald; the operation of the Chicago Police Department's in-car video system.

YOU ARE TO REPORT TO:

LEAD INVESTIGATOR	TITLE	PHONE NO.	EMAIL
Kristopher Brown	Investigator III	773-478-0221	kbrown@chicagoinspectorgeneral.org

NOTE: You MUST notify the Lead Investigator of your inability to keep this scheduled appointment.**ALSO PRESENT AT THE INTERVIEW WILL BE:**

NAME	TITLE	NAME	TITLE
Sarah Ansari	Assistant Inspector General	N/A	N/A

THE INTERVIEW WILL BE ☐ AUDIO RECORDED ☒ TRANSCRIBED BY A LIVE REPORTER

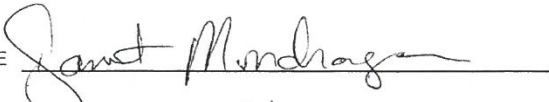
TO BE COMPLETED BY INTERVIEWEE (if applicable)

ACKNOWLEDGEMENT

Please contact Investigator Brown at (773) 478-0221 to confirm receipt of Notification of Interview and to confirm your attendance at the interview.

I hereby acknowledge receipt of this Notification of Interview.

SIGNATURE



DATE

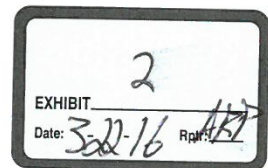
24 FEB 14

PRINTED NAME

Janet Mondragon

TIME

2248



TO BE COMPLETED BY OFFICE OF INSPECTOR GENERAL OR CPD COMPONENT PROVIDING NOTIFICATION TO INTERVIEWEE

NOTIFICATION MADE TO:

NAME	TITLE, RANK, & UNIT	DATE	TIME
PO Mondragon	P.O. Janet Mondragon	24 FEB 2016	2248
NOTIFICATION MADE BY:	TITLE, RANK, & UNIT	DATE	TIME
Sgt. Terrence Coonan	Sgt. Terrence Coonan	24 FEB 2016	2248

NOTIFICATION OF ALLEGATIONS

CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL

NAME OF ACCUSED	RANK	STAR NO.	UNIT OF ASSIGNMENT
Janet Mondragon	Police Officer	4364	008

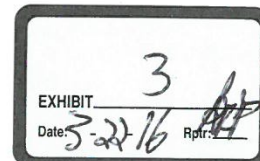
City ordinance, and if applicable, collective bargaining agreements, provide that you are entitled to notice of the nature of the allegations against you and the identity of all complainants prior to any interview. Accordingly, you are advised as follows:

COMPLAINANT

1. John J. Escalante, Interim Superintendent of Chicago Police Department, sent a letter to the City of Chicago Office of Inspector General (OIG) dated January 13, 2016, requesting that OIG conduct an administrative investigation of the following allegations arising out of the October 20, 2014 shooting death of Laquan McDonald (the McDonald Shooting): "whether any officer(s) made false statements on official reports submitted in connection with the shooting of Laquan McDonald on October 20, 2014; whether any officer(s) obstructed or interfered with the investigation of this incident, either individually or in collusion with others; and whether any officer(s) committed any violation of Chicago Police Department rules, policies, or orders in connection with their response and/or handling of this matter." Escalante attached to the letter a copy of Sergeant S. Soria's (Star # 2275) Initiation Report, which raises similar allegations of misconduct with respect to Department members in connection with the McDonald Shooting, and identified that Report as a basis for OIG's administrative investigation.

ALLEGATIONS

1. On or about October 20, 2014, you provided a false narrative to Detective David March of the Chicago Police Department (CPD) concerning the McDonald Shooting through a series of false statements and material omissions.
2. On or about October 20, 2014, you made a false statement during an interview with CPD Detective March when, with respect to the McDonald Shooting, you stated that you saw McDonald running southbound on Pulaski in the middle of the street, waving a knife.
3. On or about October 20, 2014, you made a false statement during an interview with CPD Detective March when, with respect to the McDonald Shooting, you stated that you heard Officers Walsh and Van Dyke repeatedly ordering McDonald to "Drop the knife!" as McDonald got closer and closer to the officers, continuing to wave the knife.
4. On or about October 20, 2014, you made a material omission during an interview with CPD Detective March when, with respect to the McDonald Shooting, you failed to state that McDonald changed the direction in which he was walking prior to the shooting.
5. On or about October 20, 2014, you made a material omission during an interview with CPD Detective March when, with respect to the McDonald Shooting, you failed to state that Officers Walsh and Van Dyke moved towards McDonald prior to the shooting.



6. On or about October 20, 2014, you made a false statement during an interview with CPD Detective March when, with respect to the McDonald Shooting, you stated that, as you were placing your vehicle transmission into park, you looked down and heard multiple, continuous gunshots, without pause.
7. On or about October 20, 2014, you made a false statement during an interview with CPD Detective March when, with respect to the McDonald Shooting, you stated that you did not know who fired the shots.
8. On or about October 21, 2014, you provided a false narrative to Independent Police Review Authority (IPRA) Investigator Brian Killen concerning the McDonald Shooting through a series of false statements and material omissions.
9. On or about October 21, 2014, you made a false statement during an interview with IPRA Investigator Killen when, with respect to the McDonald Shooting, you stated that McDonald was running southbound on Pulaski in the middle of the street, waving a knife.
10. On or about October 21, 2014, you made a false statement during an interview with IPRA Investigator Killen when, with respect to the McDonald Shooting, you stated McDonald was waving the knife when Officers Walsh and Van Dyke were telling him to drop it.
11. On or about October 21, 2014, you made a material omission during an interview with IPRA Investigator Killen when, with respect to the McDonald Shooting, you failed to state that McDonald changed the direction in which he was walking prior to the shooting.
12. On or about October 21, 2014, you made a material omission during an interview with IPRA Investigator Killen when, with respect to the McDonald Shooting, you failed to state that Officers Walsh and Van Dyke moved towards McDonald prior to the shooting.
13. On or about October 21, 2014, you made a false statement during an interview with IPRA Investigator Killen when, with respect to the McDonald Shooting, Killen asked if you knew who was shooting, and you stated, "No."
14. On or about October 21, 2014, you made a false statement during an interview with IPRA Investigator Killen when, with respect to the McDonald Shooting, Killen asked if you saw muzzle flashes or "anything like that," and you stated, "No."
15. On or about October 21, 2014, you made a false statement during an interview with IPRA Investigator Killen when, with respect to the McDonald Shooting, Killen asked if everything you stated was a true and accurate account of what occurred, and you stated, "Yes."
16. On or about October 20, 2014, you disabled the microphones for CPD vehicle 8779 by placing them into the vehicle's glove compartment with the batteries inserted upside down.
17. On or about October 20, 2014, you failed to ensure the in-car video system for CPD vehicle 8779 was working properly at the beginning of your tour of duty.

18. On or about October 20, 2014, you failed to immediately notify a supervisor that the in-car video system for CPD vehicle 8779 was inoperable or damaged.
19. On or about October 20, 2014, you failed to audibly record events with CPD vehicle 8779's in-car video system during your tour of duty.

ACKNOWLEDGEMENT

I hereby acknowledge receipt in writing of the identity of the complainant(s) and notice of the nature of the allegation(s) against me.

Signature Janet Mondragon Date 24 FEB 16
Printed Name Janet Mondragon Time 2254

WITNESSES

J. P. [Signature] 24 FEB 2016 2254 HRS



CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL
740 North Sedgwick Street
Suite 200
Chicago, Illinois 60654

RECEIPT FORM

OIG FILE NO. 15-0564

ON

DATE

24 FEB 2016

AT

TIME

2258 HRS

NAME

Sgt. Terrance Cordan #194

TITLE

Sgt. of Police

☐ SEIZED FROM

☐ RECEIVED FROM

☐ RETURNED TO

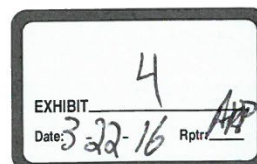
☒ RELEASED TO

NAME	TITLE	DEPT.
Janet Mondragon	Police Officer	Chicago Police Department

THE FOLLOWING ITEM(S):

1. A City of Chicago Office of Inspector General DVD containing the following materials:
 - a copy of the portion of the March 16, 2015 Case Supplementary Report for R.D. No. HX475653 that memorializes Detective David March's October 20, 2014 interview of Janet Mondragon and Daphne Sebastian;
 - Detective March's October 20, 2014 General Progress Report for R.D. No. HX475653 concerning March's October 20, 2014 interview of Janet Mondragon;
 - A copy of the transcript of the October 21, 2014 interview of Janet Mondragon, conducted by Independent Police Review Authority Investigation Brian Killen;
 - The October 20, 2014 audio and video files for the in-car video system of beat number 813R;
 - The October 20, 2014 audio and video files for the in-car video system of beat number 845R;
 - The October 20, 2014 Dunkin Donuts security video of the Laquan McDonald shooting.

ACKNOWLEDGEMENT



I hereby acknowledge receipt in writing of the above-listed item(s).

Signature Janet Mondragon

Date 24 FEB 16

Printed Name Janet Mondragon

Time 2258

WITNESSES

[Signature] #874

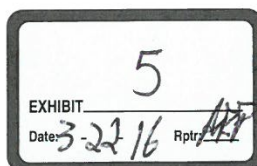
24 Feb 2016 2258 HRS

STATEMENT OF P.O. JANET MONDRAGON

CONDUCTED BY INVESTIGATOR KILLEN

ON OCTOBER 21, 2014 AT 0529 HOURS

AT AREA CENTRAL POLICE HEADQUARTERS



1072125
159

1 KILLEN: This is the audio recorded interview of Officer
2 Janet Mondragon regarding Log number 1072125 U
3 number 14 dash 36. Today is the 21st of October
4 2014. And the time is approximately 0529 hours.
5 This statement is bein' taken at Area Central
6 Police Headquarters. My name is Investigator
7 Killen, that's spelled K I L L E N. My star
8 number is 1 2 9. Also present in the room is uh
9 attorney Dan Herbert. If you would Dan.
10 HERBERT: Sure Dan, D A N, Herbert, H E R B E R T.
11
12 KILLEN: And uh also is uh FOP Field Representative
13 Kriston Kato.
14 KATO: First name is Kriston, K R I S T O N. Last name
15 K A T O. FOP Field Representative.
16
17 KILLEN: All right Officer Mondragon if you would say and
18 spell your first and last names for me.
19 P.O.MONDRAGON: Um Officer Janet, J A N E T, Mondragon, M O
20 N D R A G O N.
21
22 KILLEN: All right and what's your star number?
23 P.O.MONDRAGON: 4 3 6 4.
24
25 KILLEN: And your employee number?
26 P.O.MONDRAGON: [REDACTED]
27
28 KILLEN: All right and your date of appointment with the
29 Department?
30 P.O.MONDRAGON: April 1st, 2007.
31
32 KILLEN: All right and your date of birth?

1 P.O.MONDRAGON: Uh [REDACTED]
2
3 KILLEN: All right and your current unit of assignment is?
4 P.O.MONDRAGON: Eight.
5
6 KILLEN: Okay and how long you been to 8th District?
7 P.O.MONDRAGON: Um since I started so seven and half years
8 ago.
9
10 KILLEN: Since the beginning?
11 P.O.MONDRAGON: Yes.
12
13 KILLEN: Okay. And are you prepared to give the
14 statement?
15 P.O.MONDRAGON: Yes. This statement is not being given
16 voluntarily but under duress. I'm only givin'
17 this statement because I know I will be fired if
18 I refuse.
19
20 KILLEN: And you are aware that this statement has the
21 standing of an official Department report. And
22 that any intentional falsification of any answer
23 to any question would be in direct violations of
24 rules and regulations? Do you understand that?
25 P.O.MONDRAGON: Yes.
26
27 KILLEN: Given that, I'd like to remind you that failure
28 to provide a complete and accurate account of
29 this incident could result in a finding of a
30 violation of Rule 14 with discipline leading up
31 to and including separation from the Chicago
32 Police Department. Do you understand that?

1 P.O.MONDRAGON: Yes.
2
3 KILLEN: All right then on 20 October 2014 at
4 approximately 2150 hours what was your duty
5 status and assignment?
6 P.O.MONDRAGON: We were on routine patrol.
7
8 KILLEN: Okay so we'll start with uh on 20 October 2014
9 what time did you start work?
10 P.O.MONDRAGON: 2100.
11
12 KILLEN: And you were assigned a partner?
13 P.O.MONDRAGON: Yes.
14
15 KILLEN: And who's your partner?
16 P.O.MONDRAGON: Uh Officer Sebastian.
17
18 KILLEN: Okay. And you and Officer Sebastian the two of
19 you were in full uniform?
20 P.O.MONDRAGON: Yes.
21
22 KILLEN: And you and Officer Sebastian you were assigned a
23 vehicle?
24 P.O.MONDRAGON: Yes.
25
26 KILLEN: And what kinda vehicle?
27 P.O.MONDRAGON: Um marked squad car.
28
29 KILLEN: Okay was that a car or a Tahoe?
30 P.O.MONDRAGON: It's a Ford Explorer.
31

1 KILLEN: Ford Explorer. Okay. Uh do you remember the
2 outside number on it?
3 P.O.MONDRAGON: Yes. 8 7 7 9.
4
5 KILLEN: Were you the driver or the passenger?
6 P.O.MONDRAGON: Driver.
7
8 KILLEN: Okay. And then on 20 October 2014 at
9 approximately 2150 hours you and Officer
10 Sebastian were witnesses to a police-involved
11 shooting correct?
12 P.O.MONDRAGON: Yes.
13
14 KILLEN: Okay. And start from the beginning just tell me
15 how you became involved in that?
16 P.O.MONDRAGON: Uh we were responding to a call the officers
17 were askin' for more cars.
18
19 KILLEN: Okay do you remember why they were askin' for
20 more cars?
21 P.O.MONDRAGON: Uh yes they stated that um they had a call
22 about someone breakin' into cars. And uh the
23 offender that was on scene um had a knife. So
24 they were lookin' for a car with a taser.
25
26 KILLEN: Okay. Do you carry a taser?
27 P.O.MONDRAGON: No.
28
29 KILLEN: Does Officer Sebastian?
30 P.O.MONDRAGON: No.
31

1 KILLEN: So you, you and you hear the call over the radio
2 correct?
3 P.O.MONDRAGON: Yes.
4
5 KILLEN: So you're going as one of the assists?
6 P.O.MONDRAGON: Yes.
7
8 KILLEN: Okay. Do you remember where you were at when you
9 heard the call?
10 P.O.MONDRAGON: We were around 55th and uh what's that
11 Kostner.
12
13 KILLEN: So then so you drive --
14 P.O.MONDRAGON: We were driving westbound on 55th Street.
15
16 KILLEN: Okay so the, the call for the assist would be
17 where?
18 P.O.MONDRAGON: It was uh I believe 40th and uh Kildare.
19
20 KILLEN: So you, you, you had that (inaudible)
21 P.O.MONDRAGON: Yes.
22
23 KILLEN: Okay so do you come up Pulaski?
24 P.O.MONDRAGON: Actually I went down Kostner, northbound on
25 Kostner.
26
27 KILLEN: Okay.
28 P.O.MONDRAGON: From 55th.
29
30 KILLEN: Okay so start from the beginning so you go north
31 on Kostner and what happens?

1 P.O.MONDRAGON: Uh I go northbound on Kostner then I take
2 Archer Avenue and then I go down Pulaski.
3
4 KILLEN: Okay.
5 P.O.MONDRAGON: Going northbound towards 40th.
6
7 KILLEN: And what happens when you get to 40th?
8 P.O.MONDRAGON: Uh when we get, well when we get to 40th uh
9 there's a car in front of us already. Which I
10 believe it's 845 Robert. So I'm right behind them
11 and uh when we get to 40th Street they turn, I
12 turn right behind 'em. Um as I'm turning I see
13 the officer running.
14
15 KILLEN: You know who that is?
16 P.O.MONDRAGON: Um Officer McElligott.
17
18 KILLEN: Okay.
19 P.O.MONDRAGON: I see 'em running across the Burger King
20 parking lot. There's a Burger King there.
21
22 KILLEN: Hmm huh.
23 P.O.MONDRAGON: He's running. So as he's running I come and
24 I see 845 Robert keeps going and I do a turn to
25 go back onto Pulaski.
26
27 KILLEN: Okay so when you saw Officer McElligott did you
28 see the offender also?
29 P.O.MONDRAGON: I didn't see him.
30
31 KILLEN: Okay so the only person you see if Officer
32 McElligott?

1 P.O.MONDRAGON: I, yeah outta the corner of my eye I saw --
2
3 KILLEN: Okay so you go north on Pulaski when you get to
4 40th you turn left?
5 P.O.MONDRAGON: I turn left, yeah.
6
7 KILLEN: Okay and then you turn around --
8 P.O.MONDRAGON: I do a kind of like a U turn and come back
9 onto --
10
11 KILLEN: -- on Pulaski.
12 P.O.MONDRAGON: -- Pulaski yes.
13
14 KILLEN: And then what happens, which way do you go?
15 P.O.MONDRAGON: Uh when I come back onto Pulaski I'm going
16 south and as I'm approaching 41st Street I see the
17 offender he's uh running. And uh there's another
18 squad car coming towards us. So we're kinda
19 goin' like this. And then 45 Robert's going
20 around them.
21
22 KILLEN: Okay. So the offender is he on the sidewalk or
23 is he in the street?
24 P.O.MONDRAGON: He's on the, on the middle of the street.
25
26 KILLEN: And he's going --
27 P.O.MONDRAGON: On the intersection.
28
29 KILLEN: So he's on Pulaski?
30 P.O.MONDRAGON: Yeah he's running.
31
32 KILLEN: Which direction is he goin'?

1 P.O.MONDRAGON: Uh southbound.
2
3 KILLEN: Okay so you're behind him goin' south?
4 P.O.MONDRAGON: We're yeah. I'm right behind.
5
6 KILLEN: And who's comin' atcha?
7 P.O.MONDRAGON: Believe, well now I know it's 22.
8
9 KILLEN: Oh okay.
10 P.O.MONDRAGON: Afternoons they were facin' this way.
11
12 KILLEN: Okay so what happens as your, so you're goin'
13 south. You're, you're basically followin' the
14 offender.
15 P.O.MONDRAGON: Yes.
16
17 KILLEN: Okay and when you see the offender that's the
18 first time you see the offender then right when
19 he's on Pulaski?
20 P.O.MONDRAGON: Oh I saw 'em as soon as I come out on
21 Pulaski. I saw 'em he was running. So once I
22 got closer yes.
23
24 KILLEN: Did you see 'em with a knife in his hand?
25 P.O.MONDRAGON: I, at first I just saw 'em goin' like this.
26 Wavin' his hand up and down, up and down. Until
27 I got closer that's when I saw the knife.
28
29 KILLEN: Okay. So as you get closer you see a knife, what
30 happens then?
31 P.O.MONDRAGON: Um as I get closer you know um he's waving
32 the knife. He's movin' around. He's like not

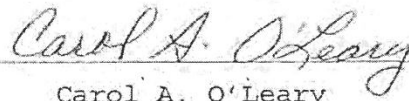
1 completely running but he's like I don't know
2 jogging, I could say. And as we come you know
3 I'm right behind 'em next thing you know I hear
4 um, I see officers um Walsh get outta their
5 vehicle and I hear them say drop the knife, drop
6 the knife, drop the knife. And he's just you
7 know wavin' it. And then that's when I hear
8 shots fired. (noise)
9
10 KILLEN: Was the offender facin' Officer Walsh and his
11 partner when, when he was wavin' that (inaudible)
12 and all that?
13 P.O.MONDRAGON: Honestly I, I (noise) how would I recall.
14
15 KILLEN: Okay. And then you, you hear drop the knife,
16 drop the knife.
17 P.O.MONDRAGON: Yeah several times. They said drop the
18 knife, drop the knife.
19
20 KILLEN: And in, are you still moving, you still driving?
21 P.O.MONDRAGON: I'm still move, slowly cause we, like I said
22 we were right behind 'em. So I'm drivin' slowly
23 right behind 'em as he's runnin'. (noise)
24
25 KILLEN: So then (noise) and then you hear the gunshots
26 correct?
27 P.O.MONDRAGON: Yes.
28
29 KILLEN: At that time did you know who was shooting?
30 P.O.MONDRAGON: No.
31

1 KILLEN: You didn't see like muzzle flashes or see nothin'
2 like that?
3 P.O.MONDRAGON: No.
4
5 KILLEN: Okay. Uh and you heard more than one gunshot?
6 P.O.MONDRAGON: Yes.
7
8 KILLEN: If you had to guess at how many you heard?
9 P.O.MONDRAGON: Several.
10
11 KILLEN: And what happens after you hear those gunshots?
12 P.O.MONDRAGON: After I hear the you know I'm like I said
13 I'm still moving and I see the offender drop
14 down. And um honestly after that it's just I
15 remember I got out of the car and actually I
16 turned this way cause I saw traffic comin' our
17 way. So I went over there and put my flashlight
18 so they could start going the other, you know
19 like turning around. I didn't want 'em to come
20 towards where the officers were.
21
22 KILLEN: That's the traffic from behind you?
23 P.O.MONDRAGON: Yeah.
24
25 KILLEN: So it woulda been comin' from the expressway?
26 P.O.MONDRAGON: Yeah the --
27
28 KILLEN: Okay so you go north on Pulaski and direct
29 traffic?
30 P.O.MONDRAGON: Yes I get outta the, my vehicle and I turn
31 around and I see the traffic coming that's when I
32 start.

1
2 KILLEN: All right. And at the time you didn't know who
3 was shooting correct?
4 P.O.MONDRAGON: No.
5
6 KILLEN: Okay. All right is there anything you'd like to
7 add?
8 P.O.MONDRAGON: No.
9
10 KILLEN: And everything you told me is a true and accurate
11 account of what occurred?
12 P.O.MONDRAGON: Yes.
13
14 KILLEN: All right this will conclude the audio recorded
15 interview of Officer uh Janet Mondragon regarding
16 Log number 1072125 U number 14 dash 36. Today is
17 the 21st of October 2014 and the time is
18 approximately 0540 hours.

1
2
3
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7
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10
11
12
13
14
15
16

I, CAROL A. O'LEARY, do hereby certify or affirm that
I have impartially transcribed the foregoing from an audio
recording of the above-mentioned proceeding to the best of
my ability.


Carol A. O'Leary

3510 S. Michigan Avenue, Chicago, Illinois 60653
(For use by Chicago Police - Bureau of Investigative Services Personnel Only)

Case id : 9825613
Sup ID : 10992767 CASR301

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SEBASTIAN, Daphne L -----

stated she was a Chicago Police Officer assigned to the 008th District. She was on duty, in uniform, working on Beat 813R. SEBASTIAN was working with Police Officer Janet MONDRAGON. The two officers were assigned to a marked vehicle. MONDRAGON was driving the vehicle and SEBASTIAN was the passenger.

The two officers responded to the request for assistance made by Beat 815R, regarding a subject with a knife. Officer SEBASTIAN thought the original call for assistance was at 40th Street and Keeler Avenue. The subject had punctured a tire on the police vehicle of Beat 815R. Officer MONDRAGON drove northbound on Pulaski Road, following Beat 845R, as they also responded to the request for assistance. MONDRAGON turned westbound onto 40th Street, behind Beat 845R.

Officer SEBASTIAN observed a black male subject, now known as Laquan MCDONALD, running southeast bound through the parking lot of the Burger King restaurant. Beat 845R pursued MCDONALD in their police vehicle, through the parking lot, toward Pulaski. SEBASTIAN told Officer MONDRAGON to drive back out onto Pulaski to assist in the pursuit. MCDONALD ran out onto Pulaski and continued to run southbound down the middle of the street. Beat 845R pursued MCDONALD in their vehicle, southbound on Pulaski, followed by Beat 813R. As MCDONALD ran southbound on Pulaski, SEBASTIAN saw the knife in his right hand. MCDONALD was waving the knife.

Beat 845R stopped their vehicle ahead of MCDONALD, between MCDONALD and the Dunkin' Donuts restaurant on the east side of Pulaski. Officers Joseph WALSH and Jason VAN DYKE exited their vehicle and drew their handguns. MCDONALD turned toward the two officers and continued to wave the knife. Sebastian heard the officers repeatedly order MCDONALD to "Drop the knife!" MCDONALD ignored the verbal directions and continued to advance on the officers, waving the knife. Officer SEBASTIAN heard multiple gunshots and MCDONALD fell to the ground, where he continued to move. SEBASTIAN did not know who fired the shots, which were fired in one continuous group. She then saw Officer WALSH kick the knife out of MCDONALD's hand.

MONDRAGON, Janet -----

stated she was a Chicago Police Officer assigned to the 008th District. MONDRAGON related the same facts as her partner, Officer Daphne SEBASTIAN.

Officer MONDRAGON added that as she drove westbound on 40th Street, she saw Officer MCELLIGOTT running eastbound through the Burger King parking lot. She made a U-turn and drove back out onto Pulaski Road. MONDRAGON turned southbound onto Pulaski. She saw Laquan MCDONALD running southbound on Pulaski, in the middle of the street. As she got closer she could see MCDONALD was holding a knife in his right hand. He was waving the knife.

Officer MONDRAGON saw Officers Joseph WALSH and Jason VAN DYKE outside of their police vehicle. She heard the officers repeatedly ordering MCDONALD to "Drop the knife!" as MCDONALD got closer and closer to the officers, continuing to wave the knife. As she was placing her vehicle transmission into Park, MONDRAGON looked down and heard multiple, continuous gunshots, without pause. MONDRAGON then saw MCDONALD fall to the ground. MONDRAGON did not know who fired the shots.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

GENERAL PROGRESS REPORT
DETECTIVE DIVISION/CHICAGO POLICE

DATE OF ORIG. CASE REPORT
DAY MONTH YEAR

DATE OF THIS REPORT
DAY MONTH YEAR WATCH

20 OCT 2014

20 OCT 2014 3

OFFENSE CLASSIFICATION—LAST PREVIOUS REPORT

0152

VICTIM'S NAME AS SHOWN ON CASE REPORT

WANDY KOS

BEAT/UNIT ASSIGNED

521

This form is designed for recording handwritten notes and memoranda which are made during the conduct of investigations, including: inter-watch memoranda (handwritten or typewritten), witness and suspect interview notes, on-scene canvas notes, and any handwritten personal notes made by detectives during the field investigation of violent crimes which are used to prepare official Department case reports.

J MONDRAGON

DRIVING W/B 40, SAW M&E RUNNING E/B THROUGH
BK LOT

MADE U-TURN, DROVE OUT TO PULASKI
S/B ON PULASKI

SAW 2 RUNNING S/B PULASKI, MIDDLE OF ST
AS SHE GOT CLOSER, SAW KNIFE IN R HAND

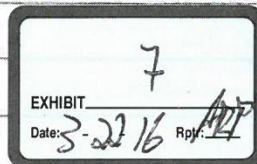
O WAVING KNIFE

SAW J & J OUTSIDE THEIR TALKING
HEARD POLS REPEATEDLY, "DROP THE KNIFE!" AS

O GOT ~~AWAY~~ CLOSER + CLOSER TO POLS, CONTINUING
TO WAVE KNIFE

AS J M PLACED TRANK INTO P, LOOKED DOWN,
HEARD MULTIPLE CONTINUOUS SHOTS, NO PAUSE
THEN SAW O FALL TO GROUND

DID NOT KNOW WHO FIRED



REPORTING OFFICER'S SIGNATURE—STAR NO.

Handwritten signature, 20563

RECEIVED BY: SUPERVISOR'S SIGNATURE—STAR NO.

Handwritten signature, 1131

DAY—MO.—YR. TIME

1

R.D. NO.

HX475653

**IN-CAR VIDEO SYSTEMS**

ISSUE DATE:	23 February 2012	EFFECTIVE DATE:	23 February 2012
RESCINDS:	Version dated 20 April 2011; S10-10		
INDEX CATEGORY:	Field Operations		

I. PURPOSE

This directive:

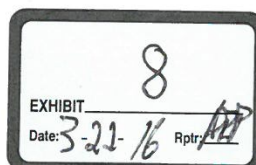
- A. implements the use of Department in-car video systems.
- B. establishes the policies and procedures for the use, maintenance, and repair of in-car video systems.
- C. establishes the roles and responsibilities of Department members affected by the introduction of in-car video systems for the video and audio recording of incidents.
- D. establishes the requirements for viewing, retaining, and duplicating digitally recorded incidents.
- E. continues the use of the Digitally Recorded Data Viewing/Hold/ Duplication Request (CPD-65.224).
- F. identifies the Records Division as the Department repository and viewing location of digitally recorded data created by the in-car video systems.

II. POLICY

The Department is committed to protecting the safety and welfare of its members and the public. The in-car video systems can provide members with an invaluable instrument to enhance criminal prosecution by providing powerful evidence of criminal activity, limit civil liabilities, and objectively document officer conduct during individual interactions. Members assigned to a vehicle equipped with an in-car video system will use it pursuant to this directive.

III. GENERAL INFORMATION

- A. There is no expectation of privacy for Department members related to incidents recorded by in-car video systems. Supervisors, members of Bureau of Internal Affairs, and the Independent Police Review Authority (IPRA) investigators may request to review the digitally recorded data from a vehicle equipped with an in-car video system. Any digitally recorded data created by the in-car video system may be used without a Department member's permission for any official Departmental purpose.
- B. The in-car video system will **automatically engage audio and video recording** when the vehicle's emergency-roof lights are activated. However, Department members may manually activate the in-car video system without the activation of the emergency equipment. At the conclusion of the incident, Department members must manually disengage all recording processes, regardless of what method activated the in-car video system.
- C. The Records Division will be the custodians of the digitally recorded data and will be responsible for the retention, duplication, and viewing of the in-car video systems. The Director, Records Division, will establish retention, viewing, and duplication procedures that provide for inventory control, the security of the digitally recorded data, and authorized duplications.
- D. All digitally recorded data created by the in-car video systems will be retained by the Records Division for a minimum of 90 days. Digitally recorded data that is marked and held as having evidentiary or training value will be retained as prescribed by law and established Department policy.
- E. In general, minor infractions and minor deviations from Department policy observed through the review of digitally recorded data will not be subject to the disciplinary process and will be treated as a training opportunity.



IV. RECORDING GUIDELINES

- A. Department members will use only Department-issued video and audio recording equipment.
- B. Department members will conform to all laws and Department policies concerning the use of the in-car video system for the video and audio recording of incidents.
 - 1. Department members are lawfully permitted to video record individuals without their consent if they are on the public way or in public view.
 - 2. Department members who are in uniform and have identified their office are lawfully permitted to simultaneously audibly and visually record individuals without their consent whenever:
 - a. the member is conducting an enforcement stop, **or**
 - b. the patrol vehicle emergency lights are activated or would otherwise be activated if not for the need to conceal the presence of law enforcement.

NOTE: Any reports completed for an audibly recorded incident, including Traffic Stop Statistical Study - Driver Information Cards (CPD-21.103), Traffic Stop Statistical Study Stickers (CPD-15.516), and Personal Service Citations, must include the initial violation or investigatory need that led to the stop.

NOTE: Department members may audibly record an enforcement stop regardless of the subsequent enforcement action taken.

- 3. Department members may audibly and visually record an individual with the consent of the individual.
- C. Uniformed Department members assigned to vehicles equipped with in-car video systems will activate the system to simultaneously audibly and visually record the entire incident for all enforcement stops.
- D. Uniformed Department members assigned to vehicles equipped with in-car video systems will activate the system to visually record the entire incident for all:
 - 1. arrests and transports.
 - 2. nonpursuit emergency vehicle operations.
 - 3. any situation that the member, through training and experience, believes to serve a proper police purpose.
- E. During the recording of an incident, Department members will not disengage the in-car video system until the entire incident has been recorded.

NOTE: Department members will be required to justify any disengagement of the in-car video system prior to the entire incident being recorded.

- F. If recorded, felony and misdemeanor arrests, motor vehicle pursuits, traffic crashes resulting in property damage, personal injury, or a fatality, DUI incidents, and failure to yield to an emergency vehicle will be automatically stored by the in-car video system indefinitely when the correct event is selected from the postevent pop-up menu. All other incidents will be automatically stored for ninety days.
- G. If digitally recorded data will be needed in judicial proceedings beyond ninety days, members will place an extended hold on that digitally recorded data as described in Item VIII of this directive, including but not limited to the following circumstances:
 - 1. Traffic stops other than DUI,

2. Enforcement stops,
 3. Other traffic crash investigations, and
 4. Stops for citizen assistance.
- H. When a complaint against a Department member is received that involves a digitally recorded incident, the investigating member will request an extended hold on the data.
- I. Assigned supervisors will request an extended hold on all digitally recorded motor vehicle pursuits and traffic crashes involving Department vehicles.

V. DEPLOYMENT OF THE IN-CAR VIDEO SYSTEMS

- A. Commanding officers of units with vehicles equipped with in-car video systems will:
1. ensure that vehicles equipped with in-car video systems are evenly distributed for use by all watches.
- NOTE:** Commanding officers will ensure the units assigned to traffic duties in district law enforcement use vehicles equipped with in-car video systems.
2. whenever feasible, ensure vehicles equipped with the in-car video systems are deployed every tour of duty and service is requested for inoperable vehicles equipped with in-car video systems.
- B. The station supervisors will:
1. deploy every vehicle equipped with a functional in-car video system during the tour of duty.
 2. ensure digitally recorded data is downloaded from the in-car video systems.
 3. whenever operationally feasible, review video of any arrest recorded by the in-car video system as part of the approval of probable cause.

VI. OPERATIONAL PROCEDURES

- A. Department members assigned to a Department vehicle equipped with an in-car video system will:
1. at the beginning of a tour of duty:
 - a. visually inspect the in-car video system equipment for damage.
 - b. obtain the remote transmitter/audio recorder and ensure it is securely attached to the member's person.
 - c. follow the start-up procedures for the in-car video system as trained and ensure the system is working properly.
- NOTE:** Members will immediately notify a supervisor if, at any time, the in-car video system is inoperable, damaged, the equipped vehicle becomes inoperable, or the remote transmitter/audio recorder is missing.
2. during the tour of duty:
 - a. audibly and visually record events in accordance with this directive.
 - b. annotate all reports, including Contact Information Cards (CPD-21.101), prepared for an event which has been recorded by listing "**Video Recorded Incident**" at the end of the narrative portion.

- c. after an incident has been recorded, use the post-event pop-up menu to select the most serious recorded occurrence as the event type and enter other event information.

NOTE: If the member did not use the postevent pop-up menu to mark the incident as being held for evidence, the member will request an extended hold on digitally recorded data in accordance with Item VIII of this directive.

- d. if the in-car video system indicates that the memory required to record incidents is becoming low or if the member observes that less than 30 minutes of recording time is available, download the digitally recorded data.

3. at the conclusion of a tour of duty:

- a. verify the in-car video system is working properly.
- b. initiate the downloading of the digitally recorded data.

NOTE: Members will immediately notify a supervisor if unable to complete the downloading of digitally recorded data due to technical problems.

- c. shut down the in-car video system and logoff the system.
- d. return the remote transmitter/audio recorder to the designated area for charging.

B. The sergeant assigned to supervise Department members using Department vehicles equipped with an in-car video system will:

- 1. monitor subordinates to ensure the in-car video system is used and that digitally recorded data is properly downloaded.
- 2. ensure that the Help Desk is contacted and a ticket number is obtained whenever any member is unable to use the in-car video system or download digitally recorded data due to technical problems.
- 3. initiate an investigation when notified of a missing or lost remote transmitter/audio recorder.
- 4. document on the Supervisor's Management Log (CPD-11.455):
 - a. whether each vehicle has an in-car video system and if it is functioning.
 - b. all responses related to malfunctions of vehicles equipped with in-car video systems.
 - c. digitally recorded data downloaded to land-based terminals, noting any units unable to complete the download and the Help Desk ticket number obtained.
 - d. any request submitted for an extended hold of digitally recorded data.
 - e. any instances of additional training, corrective measures, or disciplinary actions.
- 5. document on the Traffic Pursuit Report (CPD-22.958) or traffic crash report that the incident has been digitally recorded.
- 6. obtain a complaint register number and order an evidence technician to process the equipment if any damage or malfunction is suspected to have been caused by deliberate (tampering) means.

C. Station supervisors will:

- 1. designate a sergeant responsible for monitoring the downloading of digitally recorded data for the watch.

2. record the total number of vehicles equipped with in-car video systems deployed during the watch and the total number of these vehicle that do not have a functioning in-car video system, if any, on the Watch Incident Log (CPD-21.916).
 3. ensure the status of vehicles equipped with in-car video systems is recorded on the Personal Equipment Log (CPD-21.919) by recording the word "VIDEO" in the "Camera/Tripod No." column.
 4. if an in-car video system malfunctions or the system or vehicle becomes inoperable **during** the tour, record the vehicle and beat numbers and the words "VIDEO DOWN" on the Watch Incident Log.
- D. When digitally recorded data is determined to have evidentiary or training value, or a complaint against a Department member is received that involves a digitally recorded incident, the supervisor reviewing the recorded data will request an extended hold on the data.

VII. DOWNLOADING DIGITALLY RECORDED DATA FROM THE IN-CAR VIDEO SYSTEM

- A. When downloading digitally recorded data from the mobile unit of an in-car video system to a land-based terminal, Department members will:
1. download the data in accordance with the manufacturer's guidelines and training.
 2. ensure the download of data was complete and return the vehicle back into service.
- B. With the approval of the station supervisor in the district of occurrence, special requests for the immediate viewing of digitally recorded data from the Bureau of Detectives, Bureau of Internal Affairs, or IPRA will be processed for major incidents where an in-car camera system may be reasonably expected to have captured a component of the incident.
1. Major incidents include, but are not limited to:
 - a. police-involved shootings,
 - b. serious injury or death to a Department member,
 - c. serious injury or death to a member of the public.
 2. Special requests for viewing digitally recorded data will be made to the station supervisor in the district of occurrence, who will:
 - a. evaluate the request;
 - b. determine if the need for retrieval outweighs the operational impact of the vehicle being taken out of service; and
 - c. notify Crime Prevention and Information Center (CPIC) of the decision.
 3. Special requests will be in the form of one of the following types:
 - a. Special wireless upload, or
 - b. Emergency on-site retrieval.
- C. Special Wireless Uploads
1. The station supervisor in the district of occurrence will take the vehicle out of service and secure it at the unit of assignment or other appropriate location.
 2. The supervisor will:
 - a. verify that the vehicle operator or partner is signed on to the in-car camera system;
 - b. instruct the member to manually flag the entire tour of duty's available video for upload;

- c. instruct the member to initiate a manual upload of this video with the vehicle in range of the facility's wireless hotspot; and

NOTE: If video cannot be uploaded via wireless hotspot, a cradle upload will be used.

- d. ensure that the vehicle remains out of service until the upload is complete.
3. Once complete, the station supervisor will allow personnel from the Bureau of Detectives, Bureau of Internal Affairs, or IPRA, as appropriate, to review the uploaded files.

NOTE: For officer-involved shootings when an On-Call Incident Commander (OCIC) will respond, an emergency on-site retrieval will be immediately requested through CPIC.

4. The station supervisor may identify an alternate vehicle for the member to use while the identified vehicle completes its video upload, as appropriate.
5. If an attempt to wirelessly upload is unsuccessful, members may contact the City of Chicago Help Desk at 4-DATA for assistance.
6. If a wireless upload fails, an emergency on-site retrieval will be conducted.

D. Emergency On-Site Retrieval

1. The station supervisor in the district of occurrence will notify CPIC of an approved emergency on-site retrieval.

NOTE: An emergency on-site retrieval will only be conducted when an OCIC is responding or a wireless upload fails and contacting the City of Chicago Help Desk at 4-DATA has not resolved the problem.

2. CPIC will notify the Public Sector Information Technology (PSIT) Group personnel of a manual video retrieval from the "fail-safe" internal drive request.
3. The station supervisor in the district of occurrence will take the identified vehicle out of service during the retrieval process.
4. If the identified vehicle is still in use when the designated supervisor arrives at the unit facility or other appropriate location, the supervisor will report to the vehicle and instruct any member logged onto the system to log off the system.
5. The vehicle will remain out of service until PSIT responds and conducts the video retrieval.

NOTE: On-site review of video will be limited to the series of events and time frame giving rise to the alleged incident.

E. Viewing and Obtaining Copies of In-Car Video Recordings

1. Once retrieval has been completed for the requested time frame, the video may be viewed by personnel from the requesting party at the location of retrieval.
2. Requests for copies of in-car video recordings will be made by completing the form entitled "Digitally Recorded Data Viewing/Hold/Duplication Request" (CPD-65.224) and forwarding it to the Records Division.

F. The Managing Deputy Director, PSIT, will:

1. establish procedures to ensure the security of the digitally recorded data from downloading to storage by the Records Division.

2. develop a system to monitor the memory capacity of the land-based terminals and provide for the security of the downloaded data.
- G. If members are unable to download digitally recorded data from the mobile unit of the in-car video system to the land-based terminals due to system inoperability:
1. the station supervisor will notify the Help Desk and follow any further instructions given by the responding member of PSIT.
 2. A designated member of PSIT will respond to the requesting unit and:
 - a. ensure the security of the digitally recorded data.
 - b. perform a manual download of the digitally recorded data.
 - c. record the manual download on the Help Desk ticket.

VIII. REQUESTING A HOLD FOR DIGITALLY RECORDED DATA

- A. Department members will place an extended hold on digitally recorded data they recorded using the postevent pop-up menu on the in-car video system.
- B. **Within the first 48 hours** from downloading digitally recorded data from the vehicle, Department members **who do not use the postevent pop-up menu** and request an extended hold on digitally recorded data will request that a supervisor place the extended hold by using the land-based terminal at the district/unit station.
- C. **After the first 48 hours** from downloading digitally recorded data from the vehicle, Department members **who do not use the postevent pop-up menu** and request an extended hold on digitally recorded data will:
 1. complete the Digitally Recorded Data Viewing/Hold /Duplication Request form.
 2. indicate on the form the necessary actions by the Records Division.
 3. explain in the narrative portion of the form the reason for the request.
 4. submit the form to the station supervisor/designated unit supervisor for approval.
 5. submit the completed and approved form to the Records Division for processing and retention in accordance with existing records-retention requirements.
- D. Department members who wish to remove an extended hold on digitally recorded data will follow the procedures outlined in Item VIII-C of this directive indicating the circumstances requiring the removal of the extended hold.
- E. The Director, Records Division, will:
 1. develop a cataloging system for storage and retrieval of recordings and procedures for ensuring archives are maintained consistent with Department directives (including the Forms Retention Schedule), applicable state and federal laws, and compliance with all court orders.
 2. be responsible for retaining digitally recorded data for which an extended hold was requested as prescribed by law and established Department policy.

IX. VIEWING, RETAINING, AND DUPLICATING DIGITALLY RECORDED DATA

- A. All digitally recorded data created by the in-car video systems are the property of the Chicago Police Department. **Dissemination of any digitally recorded data outside the Department is strictly prohibited without specific authorization by the Superintendent or an appointed designee.**
 1. Any non-Departmental requests for duplication of digitally recorded data must be approved by the Superintendent or an appointed designee.

2. All approved requests will be forwarded in an expeditious manner to the Director, Records Division, along with:
 - a. a completed and approved Digitally Recorded Data Viewing/Hold/Duplication Request form, and
 - b. written instructions, including dissemination information, for compliance with the request.
- B. Department members assigned to vehicles equipped with in-car video systems and their supervisors are encouraged to use the review/ playback functions of the system for the purposes of:
 1. developing familiarity with the functions, capabilities, and limitations of the in-car video systems to create consistent recording techniques which capture relevant actions.
 2. searching for and identifying recorded events having evidentiary or training value.
 3. reviewing approach and officer safety issues.
 4. ensuring consistency with written reports.
- C. Reviewing Digitally Recorded Data

Investigating members may view digitally recorded data in the performance of official police business. When it is necessary to view digitally recorded data stored by the Records Division, the following procedures will apply:

 1. The requesting Department member will:
 - a. prepare a Digitally Recorded Data Viewing / Hold / Duplication Request form, including approval of the requestor's station supervisor/designated unit supervisor.
 - b. schedule an appointment to view the recorded incident with a Records Division supervisor (or an appointed designee) to ensure the availability of a technician and playback equipment.
 - c. present the properly completed and approved form to a Records Division supervisor at the scheduled time.
 2. A Records Division supervisor will:
 - a. process all approved recorded incident review requests.
 - b. assign a technician to assist the requestor in viewing the recorded incident, as required.
- D. Obtaining a Video Recording
 1. A duplicate copy of selected information may be made to retain that information:
 - a. when it is not required that the master video be retained for an indefinite period (e.g., investigation of a routine administrative incident when the punishment is of a summary or minor nature).
 - b. when the requesting member determines that a duplicate video of a master video will be sufficient.
 2. A duplicate video recording may be obtained by:
 - a. completing a Digitally Recorded Data Viewing / Hold / Duplication Request form and submitting the completed form to the station supervisor/designated unit supervisor for approval.
 - b. notifying the Records Division that a duplicate video recording is required and submit the approved Digitally Recorded Data Viewing/Hold/ Duplication Request form to the Director, Records Division.

- c. indicating to the Records Division which information from the digitally recorded data is to be included on the duplicate video recording.
3. When the duplicate video recording has served the purpose for which it was made, the requesting member will ensure that it is immediately returned to the Records Division.

NOTE: A member requesting a duplicate video recording will not make additional copies of it or permit unauthorized persons to duplicate or view it under any circumstances.

E. Special Situations

When the Records Division receives a request for an extended hold of digitally recorded data that indicates it pertains to:

1. **a motor vehicle pursuit or traffic crash involving a Department vehicle**, the Director, Records Division, will ensure a duplicate video is forwarded to the Traffic Review Board.
2. **an incident having training value**, the Director, Records Division, will ensure a duplicate video is forwarded to the Deputy Chief, Education and Training Division.

(Items indicated by italics/double underline were revised or added.)

Authenticated by: RMJ

Garry F. McCarthy
Superintendent of Police

11-055 / 12-003 EGV/RJN

In Car Camera Video Retrieval Work Sheet

Date & Time of Notification: 20 Oct 14 2230 1425 Related HDT# DP3 CMD
 Requestor: Det C1464 McNAUGHTON Tech: Pocnar
 Location of response: 4100 S PULASKI
 Type of Incident requiring retrieval: POLICE INVOLVED SHOOTING - FATAL: OFFENDER
 Location of Incident: 4100 S PULASKI Date & Time of Incident 20 Oct 14 2147
 Related RD#, Event#, and/or CR Log#: 14X475653

Vehicles to be checked:

813R	Veh# <u>877A</u>	POs PC#:	<u>[REDACTED]</u>	Results:	<u>[REDACTED]</u>	<u>215250</u>	<u>214218</u>	<u>MHAD</u>
815R	Veh# <u>8489</u>	POs PC#:	<u>[REDACTED]</u>	Results:	<u>[REDACTED]</u>	<u>20141020</u>	<u>2021</u>	<u>30000214</u>
822	Veh# <u>8765</u>	POs PC#:	<u>[REDACTED]</u>	Results:	<u>[REDACTED]</u>	<u>215250</u>	<u>2021</u>	<u>cur of follow</u>
845R	Veh# <u>642</u>	POs PC#:	<u>[REDACTED]</u>	Results:	<u>[REDACTED]</u>	<u>20141020</u>	<u>2021</u>	<u>MHAD 00003227</u>
841R	Veh# <u>8948</u>	POs PC#:	<u>[REDACTED]</u>	Results:	<u>1405 NO OPEN 1405</u>			

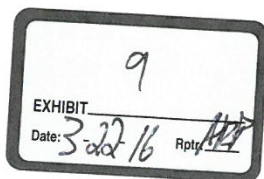
List additional Vehicle to be checked and results on back of this form

Note: Any vehicles identified to be checked, will be evaluated for operational readiness as well. Any deficiencies of the ICC System will be noted i.e. MIC(s) are not sync'd; rear camera not working; cannot upload; etc. Actions to rectify the issue should be taken to render the system FULLY FUNCTIONAL!

Notes of work or activities performed:

877A: MICs IN GLOVE BOX PORTABLES INSERTED UPSIDE DOWN
→ FULLY OP
8489: PROCESSING VIDEOS: EXTREMELY LARGE VIDEO FILES
8765: MICs IN CHARGING CHARGE; NOT SYNC'D TO SYSTEM
642: NO MICs; MIC CHARGER DISCONNECTED
8948

THIS INFORMATION DISCLOSED TO DETECTIVES; DC McNAUGHTON; & 003TH
 Tech: DISC SUPERVISORS ON SCENE
DURING VIEWING



20 OCT 2014 , HY475653

Page 1 of 1

20 Oct 2014 , HY475653

Becvar, Lance J.

Sent: Friday, July 17, 2015 12:33 PM

To: Lewin, Jonathan H.

Cc: Dziak, Steven E.

Hello Dep Lewin,

Per your request the findings related to the Aggravated Assault / Police Involved Shooting on 20 Oct 2014 Listed under RD# HY 475653:

Findings from that night-

Veh 8779 Video Recovered Titled [REDACTED] @20141020215250, No MICs because they were in the Glove Compartment with the batteries inserted upside down - Disabling them.

Veh 8489 System not engaged because a very long video (like hours long) was made previous to this event/incident and the system was processing that video and unable to start another video.

Veh 8765 System not engaged, officer related no power. There was no open HDT called in on vehicle. MICs not sync'd to system even though they were in the charging cradles.

Veh 6412 Video Recovered Titled [REDACTED] @20141020215250 view out of focus. Focusing problem found to be related to a loose cable connection for the camera. No MICs in vehicle and the charging cradles disconnected from power.

Veh 8949 System not engaged, officer reported that there was an application error - Mobile Recorder Start-Up corrupted. No Help Desk Ticket Open for this vehicle.

Sgt Lance Becvar

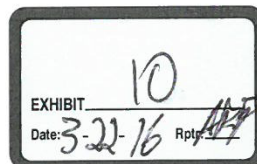
MobileTech Supervisor

Information Services Division

Chicago Police Department

Cell# 312-446-3305

E-mail: lance.becvar@chicagopolice.org



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